

## CHAPTER 5

### CONSULTATION AND COORDINATION

#### Introduction

This *Phoenix Resource Management Plan/Environmental Impact Statement* (RMP/EIS) is being prepared by specialists from the Phoenix District Office and the Phoenix Resource Area. The Arizona State Office planning staff and resource specialists provide technical reviews and suggestions. Developing this RMP/EIS began in 1986.

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Joann provided word processing for the Proposed RMP/FEIS. She has worked 23 years in federal service.



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**STATE OFFICE AND PHOENIX DISTRICT ASSISTANCE**

The following people from the BLM's Arizona State Office provided technical assistance and review for this RMPIEIS.

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William J. Ruddick, Realty Specialist  
Richard Thomas, Public Affairs Specialist

**SCOPING (Issue Identification)**

Scoping served to identify the significant issues to be analyzed in the RMP/EIS and de-emphasized or eliminated from detailed study insignificant issues or issues addressed in earlier environmental reviews. The significant environmental issues were then incorporated into a range of alternatives, and the effects or impacts of implementing the alternatives were analyzed in this RMP/EIS.

The BLM held several public scoping meetings to help identify public concerns about issues. Based on professional judgment, BLM resource specialists also identified issues. A review of all issues by resource managers and an interdisciplinary team concluded the scoping process.

The scoping process for this RMP/EIS involved several phases, extending from February 1986 to April 1988.

## **PUBLIC INVOLVEMENT AND CONSULTATION DURING DEVELOPMENT OF THE RMP/EIS**

An active public participation program was conducted from the start of the planning process for this document. The following section highlights the public participation opportunities available during the RMP's development.

### **January 1986**

*Federal Register* notice, press release and public mailing (900 individuals and groups) announcing the beginning of the Phoenix RMP/EIS and inviting public participation on issue identification.

### **February 1986**

Public meetings held in Tucson, Phoenix, Holbrook and St. Johns to solicit comments on planning issues.

### **May 1986**

Issue newsletter (900 recipients) with issue identification results.

### **March through September 1986**

Interest group scoping meetings included environmental groups, special interest public land users, city, county, state and federal government officials and Indian tribal councils.

### **November 1986**

Issue newsletter (900 recipients) to solicit comments on preliminary alternatives.

### **December 1986**

Public meetings in Tucson, Phoenix, Holbrook and St. Johns to solicit comments on alternatives.

### **January through July 1987**

Continue meetings with interest groups and individuals to discuss alternatives.

### **July 1987**

Issue newsletter describing final list of alternatives chosen for study in the RMP/EIS.

### **January 1988**

Publish draft RMP/EIS and begin 90-day public comment period.

### **February 1988**

Public hearings in Tucson and Phoenix to solicit comments on the draft RMP/EIS.

### **December 1988**

Publish Proposed RMP and Final EIS.

## **LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THIS STATEMENT WILL BE SENT**

Because of the size of the mailing list (900), only a partial list of those who will receive the document follows.

## **Federal Agencies**

Advisory Council on Historic Preservation  
Department of Agriculture  
Forest Service  
Soil Conservation Service  
Department of Defense  
Army Corps of Engineers  
U.S. Air Force  
Department of Energy  
Department of the Interior  
Bureau of Indian Affairs  
Bureau of Mines  
Bureau of Reclamation  
Department of Transportation  
Federal Aviation Administration  
Fish and Wildlife Service  
Geological Survey  
National Park Service  
Environmental Protection Agency



## **Arizona State Agencies**

Arizona Commission of Agriculture and Horticulture  
Arizona Department of Environmental Quality  
Arizona Department of Health Services  
Arizona Department of Library, Archives, and Public Records  
Arizona Department of Transportation  
Arizona Game and Fish Department  
Arizona Office of Economic Planning and Development  
Arizona Oil and Gas Commission  
Arizona Outdoor Recreation Coordinating Commission  
Arizona State Clearinghouse  
Arizona State Historic Preservation Officer  
Arizona State Land Commissioner  
Arizona State Parks Board  
Arizona Department of Water Resources  
Bureau of Geology and Mineral Technology  
Governor's Commission on Arizona Environment  
Mineral Resource Department

## Local Agencies

Central Arizona Association of Governments  
City of Casa Grande  
City of Eloy  
City of Phoenix  
City of Superior  
City of Tucson  
Gila County Planning and Zoning Department  
Maricopa County Association of Governments  
Maricopa County Board of Supervisors  
Maricopa County Parks Department  
Maricopa County Planning and Zoning Commission  
Mohave County Board of Supervisors  
Mohave County Planning and Zoning Commission  
Northern Arizona Council of Governments  
Pima County Association of Governments  
Pima County Board of Supervisors  
Pima County Parks and Recreation Department  
Pima County Planning and Zoning Department  
Pinal County Board of Supervisors  
Pinal County Planning and Zoning Department  
Yavapai County Board of Supervisors  
Yavapai County Planning and Zoning Department

## Indian Tribes and Councils

Ak-Chin Indian Community  
Fort McDowell Mohave-Apache Community Council  
Gila River Indian Community  
Hopi Tribal Council  
Navajo Tribal Council  
Pascua Yaqui Tribal Council  
Salt River Pima-Maricopa Community Council  
Tohono O'Odham Council  
Yavapai-Apache Community Council  
Yavapai-Prescott Board of Directors

## Interest Groups

Arizona Cattle Growers Association  
Arizona Desert Bighorn Sheep Society  
Arizona Mining Association  
Arizona Mining and Prospecting Association  
Arizona Nature Conservancy  
Arizona Outdoor Coalition  
Arizona Prospectors and Small Mine Operators Association  
Arizona Public Service  
Arizona State Association of Four-Wheel-Drive Clubs,  
Incorporated  
Arizona Wildlife Federation  
Audubon Society  
Bureau of Land Management Advisory Board  
Defenders of Wildlife  
Desert Tortoise Council  
International Society for the Protection of Mustangs and Burros  
Kingman Grazing Advisory Board

League of Women Voters  
National Audubon Society  
Natural Resources Defense Council, Incorporated  
New Mexico and Arizona Land and Cattle Company  
News Media  
Oil and Gas Companies  
ORV Clubs  
Phoenix District Advisory Council  
Phoenix-Lower Gila Resource Area Grazing Advisory Board  
Public Lands Council  
Rockhound Clubs  
Santa Fe Minerals  
Sierra Club, Grand Canyon Chapter  
Sierra Club, Rincon Chapter  
Sierra Club, Southwest Office  
United Four-Wheel-Drive Association  
Wild Burro Protection Association  
The Wilderness Society  
Wildlife Society  
Yuma Audubon Society

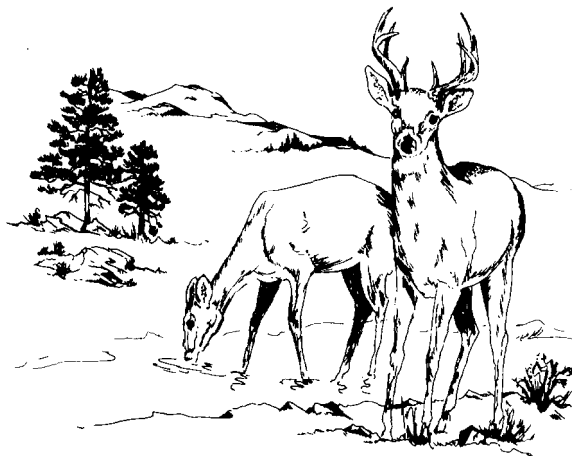
## Elected Representatives

### FEDERAL

Senator Dennis DeConcini  
Senator John McCain  
Representative Jim Kolbe  
Representative Jon Kyl  
Representative Bob Stump  
Representative Morris K. Udall  
Representative John J. Rhodes III

### STATE

Governor Rose Mofford  
Speaker of the House  
President of the Senate



## Public Comments On The Draft RMP/EIS

The results of public comments on the draft RMP/EIS are separated into three sections: 1) BLM's general response to public comments 2) public hearing transcripts 3) public comment letters and BLM's specific responses.

### BLM's General Response to Comments

**Planning Process:** This response is designed to clarify the differences between the various levels in the BLM planning process. Detailed information is available in the Planning Regulations (43 CFR 1600) and the BLM Planning Manual (Sections 1600 through 1630).

The planning system incorporates three tiers: the most general is the policy tier that identifies goals, objectives, priorities, alternatives and other factors for use in planning. Illustrative of this is the Arizona State Director Policy for Resource Management Planning that directs the initiation and development of resource management plans throughout the state.

The Resource Management Plan (RMP) is a second tier. This general document outlines planning goals and actions for multiple use management of the public lands in a district or resource area. The RMP establishes the combinations of land and resource uses; related levels of investment and production and/or protection to be maintained; and general management practices and constraints for the various public land resources covered by the plan. These are set forth as the terms, conditions and decisions that apply to BLM management activities and operations and are presented in the form of multiple-use prescriptions and plan elements.

Plan conclusions must reflect *Federal Land Policy and Management Act* (FLPMA) principles for planning and multiple use objectives (PL 94-579, Title II, Section 202.). Alternative solutions for major competitive situations, trade-offs, environmental consequences and other effects are always considered in the formulation of plan alternatives. The RMP is not a final implementation decision on actions which require further specific plans, process steps or decisions under specific provisions of law and regulations.

The third tier of planning (the activity plan) shows in detail how to carry out the particular uses provided for in the RMP tier. Activity plans are generally resource program specific; however, they may involve more than one resource program. For example, this RMP/EIS document lists the development of activity plans as a management action for implementation of the RMP. The activity plans for these areas would detail, specifically, how management goals would be carried out, a schedule for implementation, and budget requirements.

Upon approval of the RMP in a Record of Decision (ROD), some actions may be immediately implemented. Implementation of most specific actions, however, depends on the completion of environmental assessments and compliance with all applicable laws.

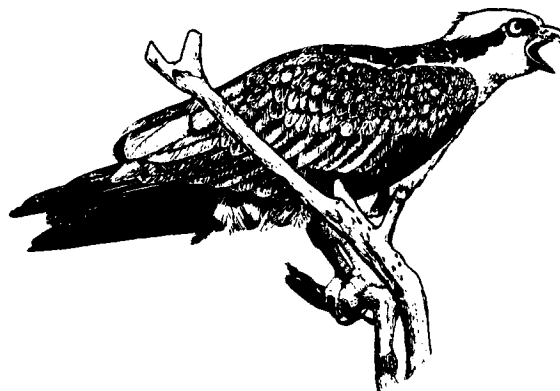
**Section 7 Consultation:** Section 7 of the *Endangered Species Act* of 1973, as amended (ESA), requires every federal agency, in consultation with the U.S. Fish and Wildlife Service, to ensure that any action it authorizes, funds or carries out is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. Further, Section 7 requires federal agencies to confer with the Secretary on any action which is likely to jeopardize the continued existence of proposed species or result in the destruction or adverse modification of proposed critical habitat.

Pursuant to an understanding with the USFWS during informal consultation in October 1987, this Proposed RMP/FEIS has been submitted to the USFWS for consultation under Section 7 of the ESA.

**Management Guidance:** Several public comments expressed concern that proposals in the RMP would conflict with the BLM's policies for wildlife management. Proposals which identify federal candidate species habitat or riparian areas for possible disposal were of particular concern. Guidelines for management and planning of candidate wildlife habitat and riparian areas, as expressed in IM-WO-87-684, Executive Orders 11988 and 11990 and the *BLM Planning Regulations*, do not automatically prohibit disposal of candidate species habitat or riparian areas.

As stated at several points in the draft RMP/EIS and this Proposed RMP/FEIS, a decision to dispose of public land is based upon the results of environmental assessments for every disposal action. The importance of the habitat or area with regard to its overall abundance and distribution, the importance of federal management in its overall survival, the foreseeable uses of the habitat or area in non-public ownership and the differences between feasible federal and non-federal protection for the habitat or area are some of the factors (considered during the environmental assessment process) which would influence a final federal management decision to dispose of or retain the land.

BLM must select the best overall multiple use plan for each area. Therefore, management cannot exclude from disposal any land because — and only because — the land is candidate species habitat or riparian area. The disposal of land does not occur without the acquisition of land. As stated in the draft and proposed RMPs, the BLM's goal is to acquire values equal to or greater than those on disposal land, and only if environmental assessments indicate disposal would be an option.



Public Hearing Transcripts

U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
PHOENIX DISTRICT \* ARIZONA

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
PHOENIX RESOURCE MANAGEMENT PLAN  
AND ENVIRONMENTAL IMPACT STATEMENT

Phoenix, Arizona  
February 25, 1988

Prepared for :  
BLM  
(Original)

RY: KATHY H. GRAVELLE

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
was taken on the 25th day of February, 1988,  
commencing at 7:00 p.m., at the Embassy Suites  
Hotel, Lavista Room, 3210 Northwest Grand Avenue,  
Phoenix, Arizona, before Hearing Officer, Mr.  
Larry Bauer.

Also present were Land Use Planner, Mr.  
Tim Sanders; Phoenix Resource Area Director, Mr.  
Arthur E. Tower; Phoenix District Manager, Mr.  
Henri Bisson.

The following proceedings were held.

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MR. SANDERS: It's 7:00. I appreciate everybody showing up tonight. We are very much interested in your comments on the Phoenix Resource Management Plan, and I guess I would like to stress that's primarily what our job tonight is: To listen to you, listen to what you have to say concerning the management plan that we have outlined for public comment.

By design, this gathering tonight is a public hearing, and it's sandwiched in between our YO--day Environmental Impact Statement.

We do have a court reporter present, and she will prepare a transcript of whatever is said tonight while the hearing is in progress. And we have a podium down here for speakers to come down and speak and let us know what you think about the Phoenix Resource Management Plan.

Larry Bauer, on my left, is the Hearing Officer, and he will have a short introduction to make and, then, we will go into listening to the speakers and recording those speakers.

Following the opening and closing of the hearing, we will have a question-and-answer session, and we will be glad to answer any

questions you have about the Phoenix Resource Management Plan. After that, we will be glad to talk to anybody who wants to, one-on-one.

With that introduction, I would like to turn the meeting over to our Hearing Officer, Larry Bauer.

MR. BAUER: Ladies and gentlemen, this public hearing bill will now come to order.

I would like to introduce myself. My name is Larry Bauer, and I'm the Deputy State Director for managers at the RLM office on 7th Street in Phoenix. I have been appointed Arizona state director by Mr. Dean Ribbles to conduct this public hearing under the authorities of the Secretary of The Interior.

This hearing concerns the Phoenix Resource Management Plan/Environmental Impact Statement in the RLM Phoenix Resource Area.

Most of you, undoubtedly, signed the attendance sheet as you came into the room. If you have not done so, I would encourage you to sign in so that we can have a written attendance for the record here.

If you plan to make a statement this evening, please be sure to select the appropriate

space on the attendance sheet or give your name to us so we can call on you.

This hearing will be recorded by a court reporter, who will prepare a transcript of everything that is said this evening. If you wish to obtain a copy of the transcript, you should make arrangements through Henry Bisson, who is the Phoenix District Manager or Art Power, the Phoenix Resource Area Manager, or Mr. Tim Sanders who is the team leader for the Phoenix Resource Area, RMP/ELS. At this time, I would like to say a few words about the Phoenix Resource Management Plan.

Our management plans four alternatives for management of the 911,000 acres of public lands and in BLMs Phoenix Resource Area. The land in question lies in eight counties: The counties of Apache, Navajo, Maricopa, Yavapai, Pinal, Pima, Gila and Santa Cruz. The plan identifies as one of the alternatives, a BLM-preferred alternative. This alternative is BLMs long-range plan for the area of the plan and discusses such things as land exchanges, utility corridors, communication sites and the designation of areas of critical environmental

concern. In addition, the plan identifies a long-range program for managing the planning areas for recreational resources.

At the front of the room, we have placed several plans which show the RLM-preferred plan. At the end of this hearing, the ALM representative will be able to discuss any questions or aspects of the plan in which you may be interested. Now, for a few words about the procedures to be used during this hearing.

This hearing is not a debate or a trial or a question-and-answer session. This advisory hearing and all interested persons present may make statements, either written or oral or both, that are pertinent to the Resource Management Plan we are covering tonight. Your oral comments will be recorded and a transcript of your comments will appear in the Environmental Impact Statement. You may also obtain these in the hearing record. Written comments should be addressed to Arthur E. Tower, Bureau of Land Management, Phoenix District Office, 7015 West Deer Valley Road, Phoenix, Arizona, 85027. This address is also included in the Draft Environmental Impact Statement, and we have



copies of that impact statement available tonight, if you do not already have one. I would also like to take a minute to discuss where the plan goes from here.

As we stated earlier, we are in the middle of a 90-day public comment period on the Draft RMP/EIS. After the comments period closes on April the 29th, we will review all comments and choose a final plan later this year. We will issue a final Environmental Impact Statement that includes a BLM-proposed resource management plan. 30 days after we issue the final environmental impact statement, we will begin to implement the proposed plan.

With that introduction, we will now begin this hearing.

Are there any governmental officials here tonight who wish to make a statement? If not, Arthur, would you bring the list over so we can call the people in order that they come in?

Our first speaker tonight is Mr. R. H. Johnson. At the beginning, I will tell you, you have up to 10 minutes to speak, and I will indicate when you have two minutes on that time left, if you have not finished. Then, we will go

ahead onto the next speaker.

MR. JOHNSON: I'm R.H. Johnson.

MR. BAUER: Please step up to our microphone, here.

MR. JOHNSON: I own the Desert Hills Ranch Morristown, Arizona, 72 sections. Under this proposal, eight sections of that ranch are being considered as a trade to developers. If this trade takes place, it will effectively amount to eight sections of Arizona trade of state lands that will be technically landlocked that we will not have access to. In this eight acres, there is one of our wells and corrals and some of the best grazing lands on the ranch.

This effectively will reduce the size of the ranch by 12-and-a-half percent. We have previously, as of December the 28th, 1987, prepared our options in writing to Mr. Bisson. I would like to have that letter go into the record or if not, we will be glad to update it and present it again.

You have the letter. Should I re-send it or will it be satisfactory as written?

MR. BAUER: Henri, would you answer that?

MR. RISSON: That's fine.

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MR. BAUER: Okay.

MR. JOHNSON: That will become a part of the record?

MR. BISSON: YRS, sir.

MR. BAUER: Thank you, very much, Mr. Johnson.

The second speaker is Allen Klinefelter.

MR. KLINEFELTER: Yrs, sir. I'm Allen Klinefelter and I'm R.H. Johnson's cattle partner.

Mr. Johnson owns Desert Hills Ranch. Some of you might be familiar with it. As you go from Phoenix to Wickenburg, you overpass Morristown and you turn right at Castle Hot Springs Road. As you cross 74 Highway, going east to Lake Pleasant, when you cross that cattle ford for the next 10 miles you are going through the middle of us.

It's comprised of about 75 sections, two adverse sections, Arizona Lands, 56 percent; BLM, 44 percent. And in the southeast corner there are ranches. There are 59 sections that are affected by this impact statement, right sections BLM wishes to take off the ranch and

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sell, give, trade, whatever, to individuals. But the very southeast section of the ranch is in an Arizona Land Lease section and because it's three sections squared, nine sections, it would effectively cut that section out of the ranch. We couldn't lease it.

There is 30 acres of Arizona lands that comes directly north from Whitman and crosses and comes on to us. There is a 4-wheel drive club that has a lease within our ranch boundaries and that would be landlocked by this trade.

If you go on north from there, it's a 40-acre Arizona Land Lease with English Wells Windmill, wells, and corrals that would be cut off from the ranch. That is the primary water source. As you probably know, we try to have a water source and have the cattle work out in a radius of one mile in each direction. If two miles, the cattle going that far will get foot sores. It now leaves the ranch in the middle of four miles.

Not only will this effectively take off the ranch's nine sections, it also will foul up our fencing plans, which has been removed by BLM of Arizona.

NO", I would like to read this letter, just because it covers the points. And also, cow punchers don't always look like this, and the time we should have been cleaning up somebody said we have a cow out trapped that we had to help.

Henri Risson, December 28th. Dear Sir: We, Johnson-Klinefelter; Desert Hills Ranch, little h, slash, in parentheses, request and strongly recommend that Bureau of Land Management disapprove, underline, the proposed land trade with developers of eight sections in Township 6 north, Range 2 west, set forth in your attached letter, for the following reasons:

1. This action would cut off from the ranch, Arizona Land Department Graze lease lands in Section 16 Township 6 north, Range 2 west.

2. English Wells Windmill, well and corrals, the only stock and game water source for the Southeast quarter of the ranch, would be lost.

3. BLM 4,878.43 acres of little h, slash, plus Arizona Land Department 640 acres in Section 16, Township 6 north, Range 7 west would be lost, making the cow-calf range operation no

longer economically feasible.

4. Johnson's investment of approximately \$5,000 per graze lease section would be lost, plus loss of improvements.

5. Two years' work on approved modified Savory Range Management System by Arizona Land Department Bill O'Sullivan and Bureau of Land Management Range Specialist Loyal Haun would be lost as loss of eight graze sections of BLM lease and one graze section of Arizona Land Department to developers, or by cutting off from ranch and water, would make cost of fencing, posts, labor, surveying, pioneering of fence lines, cattle guards and gates no longer economically feasible for shrunken cattle operations.

6. Johnson-Klinefelter, who have owned and operated Desert Hills Ranch under h, slash, brand for the past five years, have always held cattle numbers on ranch below assigned animal unit permit numbers allowed by Bureau of Land Management, 44 percent, and Arizona Land Department, 56 percent, to allow for range forbs and grasses reseeding and regrowth for stock and game feed, have always paid assessed graze fees and taxes ahead of schedule and have cooperated

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in full with any BLM and Arizona Land endeavors to improve range conditions.

7. Johnson-Klinefelter Desert Hills Ranch is one of the few remaining ranches in this area dedicated to a cow-calf operation to produce yearling calves for sale to finishing feed lots to be sold to area meat packers for beef for rapidly increasing population. Most other ranches in this area have changed to winter-grazing corriente steers purchased in Mexico because of less investment in labor and facilities, shorter work season, less taxes, less interest paid to area banks, veterinary fees, et cetera, further worsening a rapidly deteriorating balance of payments situation with foreign countries.

8. BLMs proposed land trade of these public lands with developers would effectively fence in Phoenix Four Wheel Drive Club areas in Section 18, Township 6 north, Range 2 west, used by many Phoenix city dwellers, civic groups, young people and Boy Scouts as an escape to open desert areas on holidays and weekends. These folks have made excellent ranch neighbors by policing up their area and surrounding desert,

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keeping gates closed and just generally watching over stock, game and ranch equipment.

9. We, Johnson-Klinefelter Desert Hills Ranch, ask that you carefully consider these foregoing stated points and disapprove, underline, this proposed land trade of BLM Public Lands with developers. Yours very truly, signed R.H. Johnson and Allen Klinefelter.

Also, there is a letter in here that BLM now has a copy of, because it was mailed to them. And I just have the copy from Arizona Fish and Game. They have constructed just north of English Wells one of those cisterns, desert cisterns that has the inverted roof that goes into the concrete basement cistern below, and it's fenced in. And they did a game count two years ago and said there were 24 wild bobcat and 200 deer and thousands of havalina, they don't know how much. And this is what BLM is talking about trading to developers that would also landlock that out in the middle of it. It's just north of English Wells.

I thank you.

MR. BAUER: Thank you, Mr. Klinefelter.

Our next speaker is Mr. Gene Jensen.

MR. JENSEN: Thank you, Mr. Bauer.

My name is Eugene Jensen, and I reside at 1017.0 Clair Avenue in Sun City, Arizona. I have been a resident of Arizona for six years, but in and around the state since about 1947. I'm a professional engineer with an Arizona license and I have a degree in water resource management. I have been associated with conservation since about 1935. This experience has ranged from building terraces on the family farm when I was in high school to being the technical director of the United States Environmental Protection Agency. Along with federal agencies, I have served as commissioner on the Potomac River Basin.

I'm a life member of the Nature Conservancy and past member of most of the other national conservation organizations. I have served a couple times as director of one of these organizations. I'm also active in the local community. I'm director of the homeowner's association of the advisory board of local transportation system. I'm a member of our recreational board management committee, chairman, and our hiking club elected me

committee man.

I have had three problems or three concerns with the Lake Pleasant area, which I would refer to as hieroglyphics. Generally, these fall into three areas, which I will talk about, one at a time.

The first one of them is for the hieroglyphics. It seems to me that the plan, while it may be quite adequate for the present, simply isn't going to be adequate for the future of the Phoenix metropolitan area which, like it or not, is growing at a simply enormous rate. And the western property value is probably going to be the appealing part of it, to developers in the near future. We are simply going to be overrun by events. We really need to be thinking long-range about some kind of a park status for that whole planning area, something resembling a national park.

Frankly, the Sonoran desert's ecotype really is simply being dissolved by developers as we go along. We have a remarkable chance to preserve it. It would be nice if 20, 25 years from now people could look back and see what kinds of decisions we made at the time. Were

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they looking ahead, planning For the future? Or what did they subsequently plan for the past?

And T wanted to digress just a couple minutes here. I made a disastrous set of decisions right after I got out of college. T did one of the First water quality surveys of Lake Tahoe. And we concluded at that time that Lake Tahoe was so isolated that no one could ever get there; and, secondly, thr reason is that no one would ever want to get there.

Consequently, water quality as projected would be basically a non-problem. That is just before people got interested in skiing and before the interstate highways came along. And Lake Tahoe is one of the most prominent water names. We should look far ahead just enough so we can make some long-range decisions that can do a lot better job for us and, similarly, having some kind of balanced management plan. The balanced management plan is probably all right for right now, but looking ahead farther, I think we need to come up with some kind of master plan which will transfer the Hassayampa and the adjacent Hassayampa Canyon Conservation Area, which is going to be a national operation.

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On the south area, I think it would be desirable for planners to extend the boundaries just immediately west of the Agua Fria River south state highways and north Central Arizona Project. Inclusion of that area in the planning area would be consistent with the open operation space designated by Maricopa County Planning Commission.

Third is water resource management. I'm so much confused by the description of riparian protection plans which are included really throughout the record. Maybe the people from the BLM who prepared the report understood exactly what they meant, but I don't exactly understand it. I do know that we do not have very many flowing streams left in the desert mountains and we need to protect those streams. The riparian forests left that once were there probably could be brought back.

This poses some rather interesting challenges to the Bureau Of Land Management. But I also have considerable confidence in the Department Of The Interior organization. It seems to me a challenge, not something that has to be done right away, to adopt a long-range plan

and move forward. We don't have to try 30 years down the road. Maybe they will be assimilated into this kind of system.

So let's see if we can't come up with a" imaginative approach to the Hassayampa.

I thank you.

MR. BAUER: Thank you, Mr. Jensen.

Mr. Gabriel Zinsli.

MR. ZINSKI: Thank you, Mr. Bauer, for allowing me to speak tonight. My name is Gabriel Zinsli. I live in Glendale, 8425 North 56th Avenue. I have a few comments to make about this management plan.

First of all, I would like to complement the writers of the document on the proposals and the good ideas they had concerning designating several areas as ACECs, which I think is a very important idea of resource conservation area for some of these areas. The specific management areas is good and the cooperative recreation management areas is a good idea also. I think we are getting down to the nitty-gritty of trying to plan these complex lands that the BLM is holding in trust for all of us.

Some more specific comments that I

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have. I have a comment about off-road vehicle access. On page 31, Alternative B on it states "Vehicular travel would be limited to existing roads and trails on all the RMP area's public land with the exception of those areas specifically identified as closed."

I have previously, in my comments at other hearings here, stated that I believe that off-road vehicles should be permitted where allowed. In other words, an area should be closed and an area should be designated open to off-road vehicles only where so stated. Most areas in this 900 and some thousand acres are closed to off-road vehicles, and certain designated areas should remain open to off-road vehicles.

As far as the description limited to existing roads and trails --

Gosh, it's kind of hard to identify what trails are. For the sake of clarity, maybe we should just say they would be limited to existing roads. I don't see anywhere in here where there is any statement which strictly prohibits any vehicles from accessing riparian areas. It is very, very damaging for any kind of

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a vehicle, motorized vehicle, to go traipsing up and down a riparian area.

A good example of damage that can be done by access is at Garcia's Wash. I was there just a few, maybe two weeks ago, on a Sunday afternoon, and there were probably 10 or 17 trucks with their loaders behind, where people were bringing in their off-road vehicles and they are going up and down Garcia's Wash, penetrating ever more into Hells Canyon, WSA.

Again, I would state the document does not deal strictly enough about off-road vehicles, while many, many comments in the previous years were given to the effect that it's necessary to control off-road vehicles. The other comment I have is that the Hell s Canyon area, which is part hieroglyphic mountains and an outstanding scenic and recreational area, which is really a jewel close to the Northwest Valley, very close to the Northwest Valley, probably 20 miles from Sun City, is an area that we should consider to be very dear to us and do our very best along with many others to protect as much as possible.

The document has a weakness concerning riparian areas, and I think Mr. Jensen has

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pointed out that the riparian areas in our Sonoran Desert have been destroyed, for their most part. The Salt River and Gila River used to flow, or at least a long time ago used to flow, for more than they do now in which they supported a cottonwood forest along its banks. This is, of course, now gone and many, many other riparian areas are really damaged very much by impoundments by off-road vehicles and by cattle grazing, and that destroys the banks.

I think in our state, and especially in the south part of our state, that riparian areas or where any water flows at all in some part of the year and any spring that exists on our BLM lands should be considered a treasure. And there are many riparian areas which have not been designated as ACECs, which I would like to see designated as such. We have, in Hossayampa canyon, an area. In this Hassayampa Canyon area we have water flow level 12 months out of the year, springs seeping all year round, and we should protect those very rare resources in our Sonoran Desert.

The other point I have about the proposal is that it speaks very little, if



nothing, about enforcement. And I know that it is a problem with the budgetary process where monies are allocated to the Department Of The Interior so sparingly that it is a problem to enforce the existing laws and regulations. But at some point I think the point may be that we need to put some people in the field who have the power, - to make arrests and get people to stop destroying our public lands.

One good example is the Castle Hot Springs Road, which is now very accessible because of that new street that has been put in by the Bureau Of Reclamation. People are not happy to stay on the road and travel up and down, but they have to create parking lots on either side of the road. You can see it from Sunday to Sunday where more and more areas along the road, people are just happy to park their cars there and do anything they like: Shoot cactus, you name it. These are public lands and we see no enforcements of any laws. I know it's a problem, but at some point we cannot simply designate something in the ACECs. We can't designate Perry Mesa and not protect it, because designating that might attract even more hoodlums to

go up there and tear down the walls.

MR. BAUER: Two minutes.

MR. ZINSLI: Yes, sir.

The other comment I had was about placer mining. Placer mining is a technique by which you pump water out of a flowing stream and run it over gravel or sand, looking for gold and, then, you should be putting the water not back into the river, but put it somewhere else. The question I have is our existing placer mining activities at the intersection of the Hassayampa River and Cherry Creek, south of Wagoner, are they meeting all environmental laws and all BLM requirements?

My final points would be that of the four alternatives that I see here, I do like Alternative C the best, because it affords more protection to the ACECs with a wider acreage, especially at the Hells Canyon -- not Hells canyon, White Canyon, where the Alternative C is four times more acreage allocated. And I think White Canyon is certainly a treasure that ought to be protected in more ways than is described in Alternative B.

Thank you, very much.

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MR. BAUER: Thank you, Mr. Zinsli.

Our next speaker is Daryl Drake.

MR. DRAKE: My name is Daryl Drake. I live at 1302 West Heatherbrae and that's Phoenix, and the zip is 85013. I'm here representing the Arizona Desert Racing Association of the Arizona Outdoor Coalition and it's a western regional group called the Blue Ribbon Coalition. And I just wanted to say thanks for the considering of off-highway vehicles. And you might be interested to know, I believe tonight I know it passed the committee as an ORV program, which might help to be provide enforcement funding. And it's going to have everybody have a yearly license, something like a hunting or fishing license, together, for off roads that are paid for by tax money now.

Some of the things on off-road vehicles. I feel like a lot of us are victimized by some people with propaganda designed to antagonize. We see the same tape time after time or the same shot that is taken of, say, like the Salt River, where a lot of people use ORVs.

When I talk to lots of managers of the Bureau of Land Management around the state, the

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problems have to do with types of ORVs being used in one area. Keeping all existing roads and trails open, I think, is one of the best uses. To help keep this new state plan will provide BLM and other land management Arizona agencies with money to maintain those facilities demographically. All of us are getting older and the ability to have the time or the physical ability to go out and play in desert areas is not within very many people's range. Of course, all desert experts remind us to stay with our vehicles. That's about all.

Thank you for the chance to speak. I appreciate it. Thank you.

MR. BAUER: Thank you, Mr. Drake.

Our next speaker is Bill Garver.

MR. CARVER: My name is Bill Garver. I come from Mesa and I'm the first to admit that I have just received the packet and I'm not fully abreast of the plan, in total. I have understood that there are considerations, however, to restricting certain areas from 4-wheel drive vehicles. If, indeed, that is true, as a member of Jeepers Creepers 4-wheel drive jeeping group, I would like to express our concern regarding any

plan that would restrict our great outback to access to responsible 4-wheel drive vehicles.

Our group is primarily made up of senior citizens, retired folks, numbering 40 people from all parts of the Valley, Mesa, Sun City, Rancho City West, Rio Verde. And all 4-wheel operators that we have ever come across we found to be extremely responsible people that enjoy exploring the mountains and the areas off the road. Without exception, I would say that they absolutely stay on established trails or jeeping roads, and I have never seen anyone take out across virgin desert, destroying habitat, wildlife or the plants thereon.

This group and any group I have seen out there pick up, not only after themselves, but any debris always gets trucked backed in garbage haulers to the city. There is nothing left behind in any way. Everything is deposited by groups using the off road. Any plan that would restrict 4-wheel drive vehicles would severely hamper or restrict senior citizens and many others from seeing and enjoying our beautiful Arizona outback area.

I would strongly request and urge that

consideration be given to the difference between perhaps the three and 1-wheel drive Honda motorcycle-type vehicles as opposed to your Jeep and the Jeep Cherokee and Broncos and so forth type vehicles, because there is a difference where the two types of vehicles can go and some difference in the age and type of the operators. You commonly see we have people spending \$20,000 and \$25,000 for their vehicles. And I don't think they intend to tear up that vehicle. So there is training in accessing their environments.

Therefore, I would respectfully request that no plan be adopted which would adversely affect or hinder access to outdoor areas presently open to Jeep-type vehicles.

Thank you, very much.

MR. BAUER: Thank you, Mr. Garver.

Is there anyone who has not yet spoken who would like to speak tonight?

MR. TOWER: I have one more.

MS. FARREL: As Mr. Garver, I just recently became aware of the meeting, as well.

I'm mainly here as a representative for protection of mustangs and burros in the Lake

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Pleasant area, where we currently have a burro herd. And our understanding is that the alternative would like to decrease the herd down to 80 animals. We would like to see the herd count at 180.

I'm here to bring our presentation and respectfully hope that you would take that into consideration to support Alternative B.

My name is Robin Farrel. I live at 2920 North 47th Avenue in Phoenix.

MR. BAUER: Thank you, Robin.

Is there anyone else who would like to speak tonight?

MR. MIHILOU: Yes, sir. I would like to say a few things.

MR. BAUER: Please come down.

MR. MIHILOU: My name is Bill Mihilou. I live at 1277 South Prospector's Road in Apache Junction, 85219. I really wasn't prepared to say anything tonight. Again, I really didn't study the program, but I do have a few things to say about closing lands to 4-wheel drive vehicles. I'm opposed to that. I think that off-road vehicles, such as Jeeps, et cetera, et cetera, even ATCs, we have been getting a lot of bad

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publicity, I believe.

I belong to Mesa 4-wheelers, and we are a family-oriented group. And we go out and we haul out trash and stuff left by others. We get bad publicity because of the damage done, not necessarily by a person that has a 4-wheel drive. Some of the areas that have beer bottles and trash you can get there by a motor scooter or car.

Also, I think that, along with the bad publicity is that you never --

I'm really unprepared here, but I get kind of emotional over this. I have lived here since 1959 and seen the area grow. They have a very good facility, 4-wheel drive area here. I hear the area is going to be closed, and I think that if we are going to get into publicity there is a ranch area -- I am really, I'm kind of unprepared. This area has been closed to off-road vehicle use for many, many years and those of you back in there know what a beautiful area it is. If you can go back there it's completely destroyed on the left-hand side not by off-road vehicle use, but we are talking about backpackers and equestrian use.

The point I'm making is I think that we deserve a right to be tried before we are convicted. And I think that the way things are, we have to prove ourselves. And the way it is, we are guilty before given a chance.

That's all I have got to say. Thank you.

MR. BAUER: Thank you, sir.

Is there anyone else who would like to speak tonight?

MR. ROSS: Yes, sir.

My name is Tim Ross. I live at 4031 East Ludlow Drive in Phoenix, 85032, and I'm the president of Arizona State Association of 4-Wheel drive clubs. As Mr. Drake has spoken before me, with his efforts -- as Daryl Drake has spoken before, with his efforts and the efforts of the Arizona State Association, the 4-wheel Drive Clubs, we have worked diligently in coming up with an off-road vehicle plan and has said when this bill is passed --

And we have no doubt that it will.

-- that it will provide both money for policing areas; it will also provide money for education. I believe that is where the major

problem that we have today is with public land use is if we can get out into the high schools and other public areas and put on an education program that will show people that they can't destroy the desert and the things that it does to the desert, we can lick the problem. And closing lands off to all use is not the answer.

Also, I am a member of the Phoenix 4-wheelers, and we have been told various stories. And right now, I don't know which story to believe, but I think that personally I am in favor of Alternative A. I don't want to see any more lands taken away from the public and turned over to developers. The reason that we have some land being destroyed is because? that people don't have a place to go to use lands. If we turn everything from I-17 to Wicksnburg into one large city, the only thing that's going to do is move any potential damage out further and further and cause more problems.

We need to have education so that we can stop this kind of thing, and closing the lands is not going to do that. Thank you.

MR. BAUER: Thank you, sir.

Is there anyone else who would like to

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120 speak tonight?

MR. GREENLY: My name Rill Greenly. I would to address this committee in reference to the Lake Pleasant area with wild burros. Alternative B is a good plan. I would like to see the herd of 80 burros increased to 130, 120. The burros out there are the last of the breed in this area from our ancient heritage of the wild west. If these burros are removed from the Lake Pleasant grazing area, our heritage will be going down with it. I believe that if the burros are removed, it's just one more step to extinction of any type of wild animals we have out here. It will be the burros, the", the bighorn sheep, the desert tortoise, you know, rattlesnakes next. Just keeping the herd at 120, 130 would be a great start. If not, Alternative B with the 80 would be fine. Thank you.

MR. BAUER: Thank you.

Art, did we have another speaker there?

Is there anyone else this evening that would like to speak? In that case, I would like to thank you all for coming out and for your comments and any written submissions will be

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liven full consideration.

VOICE: The record, sir, would you mind a repeating your address for the written comments?

MR. BAUER: It 's in the book, yes, inside the front covers.

VOICE: Fine, thank you. I'm sorry.

MR. BAUER: The staff will remain around to answer any detailed questions you might have this evening.

And with that, I call this hearing closed.

(The hearing was closed at 8:00 p.m.)

C E R T I F I C A T E

BE IT REMEMBERED, that heretofore, on the 25th day of February, at the time and place aforesaid, the foregoing proceedings were stenographically recorded by me and thereafter transcribed, either by me or under my direction, into the foregoing pages of printed matter, and that the same contain a full, true and accurate transcription of said proceedings, all to the best of my skill and ability.

DATED at Phoenix, Arizona, this 6th day of March, 1988.

Kathy H. Howell

Court Reporter



BUREAU OF LAND MANAGEMENT PUBLIC  
HEARING HELD AT THE TUCSON CONVENTION  
CENTER, THE COCONINO ROOM, 260 SOUTH  
CHURCH AVENUE, TUCSON, ARIZONA, ON THE  
23RD DAY OF FEBRUARY, 1988, COMMENCING  
AT THE HOUR OF 7:00 P.M.

MR. RAY A. BRADY, Hearing Officer  
MR. TIM L. SANDERS, Land Use Planner  
MR. HENRY BISSON, District Manager  
MR. ARTHUR TOWER, Area Manager

TRANSCRIPT OF PROCEEDINGS

ORIGINAL

PROCEEDINGS

MR. SANDERS: My name is Tim Sanders. I'm what they call the team leader to put together this Phoenix Resource Management Plan, which we are here tonight to discuss.

I assume everybody has a copy of the document. If you do not, we've got copies out in the front where you came in. You're welcome to pick one up.

In the Resource Management Planning Process, we have a 90-day public comment period on our environmental impact statement. And we are in that comment period right now and it runs until April 29th.

Also in that 90-day period, we have a formal public hearing where we are -- where we come and listen to whatever comments the public has about the Resource Management Plan that we're putting together for the Phoenix resource area.

Tonight we are having such a hearing. And as such, we do not really plan to make any presentation. We're here to listen to the comments that you have as members of the public, and we have a court reporter here who will record those comments.

After the hearing when we open and listen to people's comments and then close the hearing, we plan to have



a question and answer period. Or when that ends, we'll have all the representatives present who will talk to any of you individually who would like to talk about any of the concerns **OR** issues, you would like to talk about concerning the Resource Management Plan.

Ray Brady is the Bureau of Land Management **Safford** District Manager. And he "as selected to be the Hearing Officer tonight. **So** as such, **I'm** going to turn the meeting over to Ray and let him pretty much run the meeting.

He will call on whoever wishes to speak. YOU can either raise your right hand or else give us your name, whatever you prefer to do. And we'll run through the hearing and we'll have a question and answer period.

MR. BRADY: Thank you very much. Can you hear me there?

As Tim said, I'm Ray Brady, the District Manager with the Safford District, Bureau of Land Management, here in **Arizona**.

I "es appointed by the Arizona State Director of the BLM to conduct this public hearing this evening under the authority of the Secretary of Interior. This hearing tonight is concerning the Draft Resource Management Plan and Environmental Impact Statement for **BLM**, Phoenix resource area.

Most of you have probably signed in as you came

here this evening. If you've not done so, I would encourage you to sign the sign-in sheet **as** you leave **so** that we have a complete written record of tonight's attendance here in Tucson.

If you plan to make a statement this evening, I hope that you checked the appropriate box on the sign-in sheet. If you haven't, we've only got a few people here so just raise your hands and we'll make **sure** you have an opportunity to speak this evening.

This hearing is being recorded by a court reporter who will prepare a verbatim transcript of everything that is said this evening. If you wish to obtain a personal copy of the transcript, you should make your own arrangements with the court reporter. And Olivia is the reporter here this evening and she is seated down in front of me.

Other BLM representatives are here this evening that I would like to introduce. First is Henry Bisson (phonetic), he is the District Manager for the Phoenix District Manager's Office. And Arthur Taylor, who is the Area Manager for the Phoenix Resource area, and Tim Sanders has introduced himself. He is the team leader for this specific planning effort.

I'd like to say **a** few words about the Phoenix **Resource** Management Plan we will be discussing this evening and hearing your comments on. The Draft Resource Management

Plan identifies four alternatives for managing some 911,000 acres of public land in the BLM Phoenix Resource Area. The land in question lies in eight counties in Arizona, very large areas encompassing counties of Apache, Navajo, Yavapi, Maricopa, Pinal, Pima, Gila and Santa Cruz.

The draft plan identifies as one of these alternatives a BLM preferred alternative. This alternative is BLM's preferred long-range plan for the area. The plan discusses such things as land exchanges, utility corridors, communication sites, special management areas and the designation of areas of critical environmental concern.

In addition, the plan identifies a long-range program for managing the planning areas for recreation resources.

Along the side of the room here this evening we have several maps that show BLM's preferred plan. And at the end of this hearing, several of the BLM representatives here in attendance this evening will be available to answer some of your more specific questions from these maps, if you'd like to come up after the hearing.

Tim briefly mentioned where we are in the planning process, but I'd like to expand upon that a little bit. The procedure that's going to be used tonight -- this hearing is not a debate ~~or~~ a trial ~~or~~ a controversial question and answer type session. It's an advisory hearing

only and all interested persons may make statements, either written ~~or~~ oral that are pertinent to the Phoenix Resource Management Plan.

There will be no cross examination of the people making presentations. You may request that -- members of the audience may request that certain items be clarified more. And if someone would like to have a statement clarified, if they could address that to me and then I could address that back to the speaker this evening.

I would first call upon any elected governmental officials that may be here this evening, and then we'll open the floor up for other speakers that may be present. I'd like to limit the speaking time to about ten minutes and I don't think that should create any problems this evening with the limited number of people that are here.

You may submit further written comments, if you'd like to, after your verbal comments this evening. And any written statements submitted will also be included in the transcript and will be considered on the same basis as any oral comments.

The period of time for submitting written comments is through April 29th. And any comments received up to that point in time will be included in the hearing record. The address for sending any further written comments is provided in the front cover of the plan and EIS that you

picked up in the front corridor.

This hearing tonight is being conducted during the 90-day public comment period on the draft plan. A hearing is also scheduled in Phoenix on Thursday evening of this week, February 25th. After the comment period closes on April 29th, all the comments will be reviewed by the planning team and a final plan will be prepared for the Phoenix Resource Management Plan. It is expected that in September, a final Environmental Impact Statement will be issued that includes BLM's final proposed Resource Management Plan.

And 30 days after that final EIS is issued, the proposed plan can then be implemented.

With that introductory statement, I'd like to now open up this evening's hearing for formal statements by members of the public. I'd first like to see if there's any elected official, either representative of a Congressional representative or someone from the State.

Do we have anybody -- any parties here?

Okay. Seeing none, do we have a list of names from the sign-in sheet?

MR. SANDERS: Nobody signed in to speak, but if you'd like to, you're welcome to just raise your hand and speak up.

MR. BRADY: Do we have any parties that would like to speak this evening?

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A mad rush to the microphone. You in the red hat, you could go ahead to the microphone and state your name and affiliation, if you're not representing yourself, for the record.

STU BENGSON: My name is Stu Bengson. I live in Tucson and tonight I'll be representing the Arizona Mining Association, for lack of a different hat to wear tonight.

Looking through this draft, EIS, here there's a couple of concerns that I think that we're going to have. However, I really haven't had time to study the entire document thoroughly yet. So some of my comments may be out of place.

But one of the concerns that we have, that I would think that we would have, would be this acquisition of over 119,000 acres of private land that you propose in your Preferred Alternative B. And I'm not sure exactly what you had in mind there, where these lands are, how you would acquire them. Is this part of the Empire Ranch exchange or is that, you know, Empire Ranch proposal a separate process not covered in this EIS? That would be one question I would have to start off with.

Can anybody answer that at this point quickly?  
or --

MR. BRADY: Mr. Sanders?

MR. SANDERS: I can probably clarify that.

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MR. BENGSON: Okay.

MR. SANDERS: Our intent is we have **areas** identified that encompass private land where we will look at acquiring those lands. It's really dependent on the land **owner** coming to us and saying, "Yes, we would like to enter into some kind of trade with **BLM**," rather than us going to them and seeking to acquire their lands.

All we've done is identified a large area **where** we're going to look at acquisition. But we would like the land **owners** essentially to **come to us to start that** process.

MR. BENGSON: DO you have any specific location **or** area, in general, like are you looking mostly around **New Waddell Dam** and **some of that country there or** around the Empire Cienega property **or** what?

MR. SANDERS: The Empire Cienega is not lined in that 119,000 **acres**. Those private lands that are identified are in areas where we've identified resource **conservation** areas **that** we're looking at acquiring Federal **or** State. And whatever private lands we **can**.

MR. BENGSON: So those private acquisitions the" would be mostly centered around these RCA's that you proposed in Alternative B?

MR. SANDERS: That's right. **Yes**.

MR. BENGSON: Another question I had, and like I say just really quickly going through this thing, in your

preferred alternative you expect a 50 percent reduction in mining notices and 75 percent reduction in, I presume MPO means Mining Plan of Operation?

MR. BRADY: **Yes**.

MR. BENGSON: Can you just briefly **maybe** explain that a little bit, how you figure your going to reduce mining but you're still going to allow it?

MR. SANDERS: well --

MR. BENGSON: You know, provide for exploration and development of mineral resources?

MR. SANDERS: I think I would probably prefer to deal with that **as** a question when **we** do the final impact **statement**. That's a good question.

MR. BENGSON: The other thing **that concerns** me, **also**, is in particular is one of the RCA areas that you're dealing with here, White Canyon in particular. I hope you realize it's in a heavily mineralized area and the Arizona Mining Association is now in the process of developing a complete report on that **area** in regard to the proposed wilderness that's been suggested for that area.

And I just hope that you realize that that is a highly mineralized **area**, **whatever management** plan you **come** up with should account for future mineral development of that particular land there.

That's about all I've got to say for now.

MR. BRADY: Okay. Thank you, St".

Are there any other individuals that would like to make some oral statements this evening?

If you could state your name, please, and affiliation if you're not representing yourself?

MR. GAMBELL: My name is Neil Gambell. I'm here representing the company I work for, ASARCO. I live and work in the White Canyon resource conservation area that you've outlined in here. I'll make just a brief -- a few brief comments. We will be submitting written comments before the deadline.

I refer you to a table on Page 2-1 -- or Table 2-1 on Page 23, where you talk about the acreage in the White Canyon resource conservation area. All that breaks down to the fact that 53.1 percent of that land the Federal government doesn't own. And I find it kind of hard to believe that they're actually going to go out and acquire this land and be able to do anything with it from a management standpoint.

You can see how checkerboard that White Canyon map is up there just to the right of -- or to your left. It's not an easy thing to do to manage that.

We operate a large open-pit mine on mostly -- on private land and there you recognize the mineral potential of the Copper Butte area.

The fact that there are mines and will undoubtedly be other mines in the area. The designation of both under Alternative B and C of the area of critical environmental concern.

And the Copper Butte Mineral District or area would close off roads at the ACEC boundary which we built in the old days and still use to access our mining claims.

And the White Canyon and Walnut Canyon areas, if they close those roads off the Gila River runs across the southern boundary of that White Canyon conservation area, there's no way to get across that river to get in there to do our assessment work. It would really hinder us.

I have some questions in the area you outlined in orange on that map is all power site withdrawals and Butte Dam withdrawals. It's my understanding that the Bureau of Reclamation is going to go ahead and build the Butte Dam in there. And I guess the land in there would come under their administration.

You've outlined it in this study for management of repairion habitat and other ideas. I don't know what you propose to do with the -- with the fact of Butte's Dam being built on the Gila River between north and south Butte in that resource conservation area.

At this time that's all I have to say about the report. I may ask some questions when we get into the

question and answer period.

Thank you.

MR. BRADY: Thank you, Mr. Gambell.

Yes, sir. If you can state your name?

MR. MONAHAN: Tom Monahan, Pima County Parks & Recreation Department analyst.

We wish to support your resource management plan for everything you're doing to us as Pima County. And acquiring the Tortolita Mountains and securing the Waterman Mountains, Silverbell area, Baboquivari and what you've done in the past on Tucson Mountain Park and all the district and neighborhood parks that you've helped us secure in Pima county. And we wish the best of luck on your resource management plan. Thank you very much.

MR. BRADY: Thank you, Mr. Monahan. Any other individuals?

one last call? Well, if there are no other individuals, I'd like to make some statements this evening.

MR. SANDERS: Did you want to speak, sir, in the blue shirt?

SPEAKER: No.

MR. SANDERS: You looked like you were getting ready to --

SPEAKER: No.

MR. BRADY: I would like to thank the

individuals that did show up this evening for coming out and showing your interest in public land management issues.

Your comments and written submissions in the future will be given full consideration in preparation of the final EIS and planning development.

As I stated previously, the record will be open through April 29th for any additional comments that you'd like to make. And I welcome you to use that opportunity to submit any further comments, if you have them.

So closing that, I want to thank you again for showing up this evening. We will be available here now to work directly with you one on one for some more questions and answers if you'd like to.

(Whereupon the hearing was concluded.)

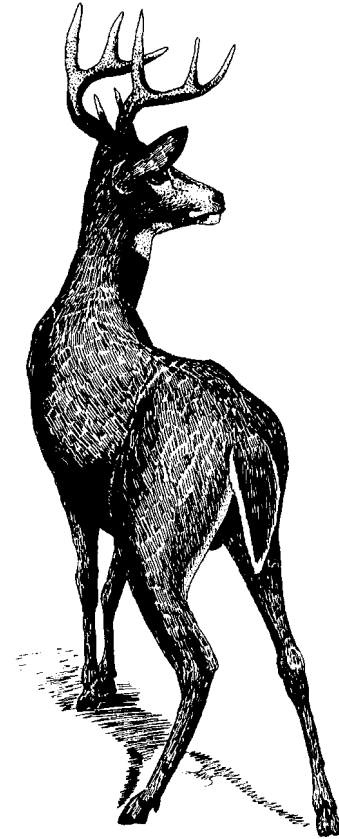
STATE OF ARIZONA     )  
                              )     ss:  
COUNTY OF PIMA        )

I, OLIVIA ARMENTA (nee AYALA) a Notary Public in  
and for the State of Arizona, County of Pima, do hereby  
certify:

THAT this is a true and accurate record of the  
proceedings taken at a Hearing held on February 23rd, 1988,  
before RAY A. BRADY, Hearing Officer, as stenographically  
recorded by me and transcribed under my direction.

IN WITNESS WHEREOF, I have hereunto set my hand  
this 3rd day of March, 1988.

  
Notary Public



## PUBLIC COMMENT LETTERS

Letter No.	Name
2	Annandale, John
3	Santa Fe Railroad Company
4	Ranney, Wayne
5	Sun City Hikers
6	International Society for Protection of Mustangs and Burros, Arizona Chapter
7	Maricopa Water District
8	Davis, Hiram
9	Leonard, Sandra
10	Friends of the Hyroglyphic Mountains
11	U.S. Bureau of Mines
12	U.S. Bureau of Reclamation, Arizona Projects Office
13	Jensen, Eugene
14	Miller, Charley
15	Peleck, Walter and Dorothy
16	Defenders of Wildlife, SW Office
17	Arizona State Clearinghouse
18	Maricopa County Dept. of Planning and Development
19	The Desert Tortoise Council
20	El Paso Natural Gas Company
21	Pamperin, J.
22	Notestine, Jim
23	The Arizona Nature Conservancy
24	U.S. Department of the Air Force
25	National Parks and Conservation Association
26	Prescott Audubon Society - Conservation Committee
27	Bell, Seltzer, Park and Gibson
28	Walton, Christy
29	Sullivan, Robert D.
30	U.S. Fish and Wildlife Service, Ecological Services
31	ASARCO Ray Unit
32	Pima County Open Space Committee
33	Sierra Club, Palo Verde Group
34	U.S.D.I., National Park Service, Western Region
35	Arizona Game and Fish Department
36	Sierra Club, Rincon Group
37	The Wildlife Society, Arizona Chapter
38	McKinley County Wildlife Federation
39	U.S.D.I., Bureau of Reclamation, Regional Office
40	Arizona Mining Association
41	U.S.D.I., National Park Service, Petrified Forest N.P.
42	Sierra Club, Grand Canyon Chapter, Rincon Group
43	Arizona Cattle Growers Association
44	Zinn, David

Letter No.	Name
44	U.S. Environmental Protection Agency, Region IX, California
45	U.S.D.A., Prescott National Forest

## PUBLIC COMMENT LETTERS - GROUPED

### INDIVIDUALS

Letter No.	Name
1	Annandale, John
26	Bell, Seltzer, Park and Gibson
7	Davis, Hiram
12	Jensen, Eugene
8	Leonard, Sandra
13	Miller, Charley
21	Notestine, Jim
20	Pamperin, J.
14	Peleck, Walter and Dorothy
3	Ranney, Wayne
28	Sullivan, Robert D.
27	Walton, Christy
43	Zinn, David

### GROUPS AND ORGANIZATIONS

Letter No.	Name
42	Arizona Cattle Growers Association
39	Arizona Mining Association
15	Defenders of Wildlife, SW Office
9	Friends of Hyroglyphic Mountains
5	International Society for Protection of Mustangs and Burros, Arizona Chapter
6	Maricopa Water District
37	McKinley County Wildlife Federation
24	National Parks and Conservation Association
25	Prescott Audubon Conservation Committee
41	Sierra Club, Grand Canyon Chapter, Rincon Group
32	Sierra Club, Palo Verde Group
35	Sierra Club, Rincon Group
4	Sun City Hikers
22	The Arizona Nature Conservancy
18	The Desert Tortoise Council
36	The Wildlife Society, Arizona Chapter



**GOVERNMENT AGENCIES AND AFFILIATES****LOCAL****Letter No. Name**

17 Maricopa County Dept. of Planning and  
Development

31 Pima County Open Space Committee

**STATE**

34 Arizona Game and Fish Department

16 Arizona State Clearinghouse

**FEDERAL****Letter No. Name**

10 U.S. Bureau of Mines

11 U.S. Bureau of Reclamation, Arizona Projects  
Office

23

45

38

40

33

44

29

U.S. Department of the Air Force

U.S.D.A., Prescott National Forest

U.S.D.I., Bureau of Reclamation, Regional  
Office

U.S.D.I., National Park Service, Petrified  
Forest N.P.

U.S.D.I., National Park Service, Western  
Region

U.S. Environmental Protection Agency, Region  
IX, California

U.S. Fish and Wildlife Service, Ecological  
Services

**CORPORATIONS****Letter No. Name**

30 ASARCO Ray Unit

19 El Paso Natural Gas Company

2 Santa Fe Railroad Company



February 1, 1988

Mr Arthur E. Tower  
Phoenix Resource Area Manager  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

After carefully reading y the Phoenix Resource Management Plan and Environmental Impact Statement Draft, December 1987, I decided to write to register my surprise and astonishment!

The preferred plan alternative would try to acquire 357,190 acres of state land and 119,240 acres of private land and dispose of 427,000 acres of federal land. That's nearly one million acres of land! (page xii)

You say, on page 141 that public land (federal ownership) would be reduced by 12 percent

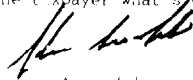
1-1 | What I want to question is your REASON for this. You haven't shown me (or any reader) any PROOF that this is a GOOD IDEA

1-2 | An environmental impact report should show IMPACTS. You haven't shown me (or any reader) that you looked at the IMPACTS of letting 12 percent of the federal land in your district go into other ownership

1-3 | I looked for some kind of economic PROOF. Unless I'm wrong, you didn't even have an economist as a writer. When the Air Force and Army, or the Reclamation Bureau, or EVEN a little city council has to show people what the BOTTOM LINE is (DOLLARS), why don't you have to do this?

Or -- why don't you WANT to do this. Are you trying to hide something?

1-4 | I don't know much about LAW, but I don't think it is LEGAL to do what you're doing in this plan. To trade nearly a million acres (to and from) and not to tell the taxpayer what's going on is NOT HONEST!

  
Arthur E. Tower  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

- 1-1. The rationale for the BLM's Phoenix District land exchange program is stated on page 5 of the draft RMP/EIS under Issue 1: Land Tenure Adjustment. By using its land exchange authority, the BLM would work to consolidate public land holdings into more manageable blocks, provide greater expanses of public open space and protect rare or unique resources.
- 1-2. Chapter Four of the draft RMP/EIS analyzes the impacts of implementing four alternatives.
- 1-3. Economic determinations were made by the interdisciplinary planning team which determined that by concentrating management within larger blocks of public land, more efficient use would be made of available funds.
- 1-4. The Federal Land Policy and Management Act (FLPMA) of 1976 (Public Law 94-579) provides the authority and guidance for using land exchanges to serve the national interest. Public comment has also been solicited from the beginning of this planning effort. Please refer to Chapter 5 for a summary of the public input during the development of this plan.

Santa Fe Pacific Railroad Company

6200 Uptown Blvd NE Suite 400  
Box 27019  
Albuquerque New Mexico 87125  
505/881-3050

February 9, 1988

Mr. Arthur E. Tower, Area Manager  
Phoenix Resource Area  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Art:

This letter is in response to your request for comments to the Draft Phoenix Resource Management Plan and EIS, dated December 1987. As you are aware, the BLM and Santa Fe Pacific are working on an exchange of mineral interests through which the Federal Government will acquire Santa Fe Pacific's mineral estate beneath the Navajo relocation ranches in Apache County. Santa Fe Pacific will acquire federal mineral estates offered by the BLM in Apache, Navajo, and Coconino Counties. Santa Fe Pacific believes the Draft RMP and EIS should reflect these pending land tenure adjustments in the discussions on "Land Uses." Thank you for the opportunity to comment.

Very truly yours,

*G. G. Byers*  
G. G. Byers  
Director Public Affairs



Z-1. The draft RMP/EIS discusses possibilities for future land tenure adjustments under various alternatives.

The BLM-Santa Fe Pacific mineral estate exchange is proceeding under the authority of current management plans. Current planning will remain in force until the new RMP is approved and implementation begins.

3 \

February 12, 1988

Wayne Ranney  
 823 1/2 W. Aspen #5  
 Flagstaff, A Z 86001

Arthur E. Tower  
 Phoenix Resource Area Manager  
 2015 W. Deer Valley Road  
 Phoenix, AZ 85027

Dear Mr. Tower :

Thank you for the opportunity to respond to your Draft EIS for the Phoenix Resource Area, December, 1987. I am an active user of these lands and very interested in how they are managed in the future.

I am very much in favor of consolidation of holdings between the state, the feds, and private parties. Management of these respective areas will be enhanced if ownership blocks are consolidated. You are to be commended for this initiative.

- 134
- 3-1 I have some very specific comments which I hope you will take into consideration. To determine future management policy based on a simple two alternative (essentially) method is unreasonable. I would like to see the best of Alternatives B and C incorporated into a management policy. Specifically, I like your proposed Alternative B with the following additions of Alternative C: 1) The boundaries of the RCA's should be those from Alternative C because that maximizes the area of federal protection. If you can identify those areas as being part of a manageable unit, why not include that additional acreage into the RCA? I strongly encourage you to use the Alternative C boundaries. Please include the Picacho Mountains in with this. Other lands not within the Alternative C boundaries can be used for disposal and sale. 2) Perry Mesa/Larry Canyon should be a priority ACEC in its entirety of 19,760 acres. This area is a fantastic recreational jewel and would be a great asset of the Black Canyon RCA. Please give the Perry Mesa/Larry Canyon ACEC your every consideration for inclusion as a BLM protected resource. I have wandered around up there and it is definitely worth it!!!! 3) I approve of your selection for the rest of the ACEC's. Thank you for including them. I hope you will give every consideration to my suggested additions to your Alternative B. My views represent a well-thought out vision towards how these lands will be utilized in the future.
- 3-2

Thank you for this opportunity.

Sincerely,

Wayne Ranney  
 wayne Ranney

- 3-1. The decision to select a final Resource Management Plan results **from** a complex process summarized in Chapter 1. The process involves extensive intergovernmental and public review of a thorough analysis by BLM specialists and managers of a range of reasonable alternatives.
- 3-2. After consideration of public comment, the resource values present and expected availability of nonfederal land for acquisition, BLM feels the **RCA** boundaries proposed in this document encompass the most feasible management units.

SUN CITY HIKERS  
Sun City, Arizona

Mr. Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 Deer Valley Road  
Phoenix, Arizona, 85027

Dear Mr. Tower:

We have reviewed the Draft of the Phoenix Resource Management Plan and Environmental Impact Statement. Our comments are set forth in the following paragraphs.

We generally endorse the levels of management which have been considered, EXCEPT FOR THE URBAN AREAS, and agree that Alternative B is the best management choice. We do not agree with the conclusions that a Wilderness area should not be established in the Hells Canyon area--but also recognize that this is an independent issue. Presumably, Alternative B can accommodate Wilderness areas if they are established by the Congress.

4-1

The administrative procedures followed by the Bureau in its study process have had some unfortunate consequences insofar as the NW portion of the Valley of the Sun is concerned. This deficiency is of sufficient importance to justify a major addition to the final draft of the Management Plan and Impact Statement. Specifically, the Report should consolidate all recommendations for BLM lands that have open space potential for the NW Valley, i.e., Lake Pleasant, Hassayampa Canyon, Sierra Estrella, North and South Maricopa Mountains and Butterfield Trail Memorial. We suggest that this be incorporated as an annex.

4-2

We believe that the Lake Pleasant Resource Conservation Area should be expanded to include approximately 12 square miles of additional land south of State Road 74 and west of the Agua Fria. Such an expansion would recognize the land use classification adopted by the Maricopa County Planning Commission, and the recreation opportunities in the Saddleback Mountain/ Paddleford Wash area. Expansion of the area would recognize the long term demand for open space that will accompany the projected population growth of the NW Valley. We are not prepared to offer specific boundaries at this time, and believe that some further examination of the area would be necessary.

**4-1. Each resource area within the Phoenix District has or will be preparing a Resource Management Plan for public land under its administration. As discussed in Chapter 1, this RMP focuses on resolving six key planning issues in the Phoenix Resource Area. Any significant inconsistencies between the final plan and plans of other BLM Resource Areas will be resolved before the plan is implemented.**

**4-2. The proposed RMP identifies sections 25, 26 and the Saddleback Mountain portion of section 35 in Township 6 North, Range 1 West south of Arizona Highway 74 for inclusion in the Lake Pleasant RCA.**

**Refer also to response 17-1.**

4-3

Although we endorse **Alternative B** for management of the Lake Pleasant area (with inclusion of the Hassayampa Canyon area), we think that the Bureau has been short sighted in its evaluation of how this area will fulfill open space needs for the projected population growth of the Northwest Valley. We recommend that the potential need be recognized and ~~that~~ provisions be made for a study committee which could produce ~~no~~ specific recommendations within the next two years. This recommendation carries with it the acknowledgment that land trades and/or purchases may be necessary for the area to reach its full potential as a premier open-space area for the NW Valley. We are not concerned with definitions for solitude--a relative term applied in a different way in a major metropolitan area.

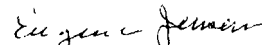
In substance, we believe that the Bureau should develop at least the framework for a major "outdoor recreation area" which would have many of the characteristics of the National Recreation Areas administered by the National Park Service. In addition, the Lake Pleasant area contains some of the prime remnants of the Sonoran Desert which justify some form of special classification. This proposal would also recognize that the concept of multiple resource management has a different meaning when applied in an exploding metropolitan area.

We want to again emphasize the need to consolidate the BLM recommendations for the Hassayampa River and to avoid a fragmented management approach. Desert streams are such a vital part of the fragile desert ecosystem that we should make a determined effort to protect both the stream and the associated riparian zones. Water quality monitoring, both biological and chemical, should also be an important aspect of "riparian" management, especially in an area with multiple resource management.

We have a few other minor comments on the draft. These are tabulated in an attachment to this letter.

We appreciate the opportunity to comment on these reports.

Sincerely



Eugene Jensen, P. E.  
Chairman, Open Space Planning

4-3.

The need for open space recreation opportunities for residents of the Phoenix metropolitan area, particularly for citizens of the northwest valley, is recognized by the BLM. To advance this goal, the RMP proposes to establish the Lake Pleasant Resource Conservation Area, the Black Canyon Resource Conservation Area, the Hells Canyon Recreation Management Area and the Hassayampa River Riparian Management Area. The BLM would retain all public land in these areas and pursue the acquisition of state land through the BLM-state of Arizona exchange program. Private land may also be acquired if the exchange is initiated by the private owners.

- 4-4 Page 18. The report does not identify floodplains. Are there any floodplains and what are their **potentials** for recreational use.
- Page 20. The statement is made that BLM does not anticipate land purchases to blak-up ownership. It would be better to identify the **areas** that would need to be acquired for best management practices--and leave the financial questions to the budget process. **Eventually**, it might be **quite** desirable to purchase **some** areas to block out units, especially in the urban areas.
- 4-5 Page 23. It is difficult to identify those areas that might be considered for disposal under the exchange program.
- 4-6 Page 24. The treatment of **communication** sites is incomplete. It would certainly not **be** desirable to have the White Tanks converted into another South Mountain! **Some** further discussion on the number and types of facilities which would **be** accepted is needed.
- Page 30. The **SMA** for the Hassayampa needs to be cross indexed to the adjacent study area. A footnote which would demonstrate consistency of management practice would be adequate.
- 4-7 Page 42. Recreational Management. The section includes an "it was determined" without any discussion of the basis for the determination, or identification of those who made the determination.
- Page 95. Speculating on the price of copper is probably not an essential element of the report. We can probably assume that copper will continue to be an important industrial metal and that the price will go up and down!
- Page 121. Recreational use. The new road is west of Lake Pleasant. Speculating on the future of Castle Hot Springs **may be** as risky as predicting the price of copper. **Some** discussion of the history of this remarkable facility would be in order.
- 4-8 Page 128. Where is the lower Agua Fria Valley?
- Page 144. The statement on **riparian** management seems to be inconsistent with the projected quality as shown in Table 4-3.
- Page 169. Apparently the small cities and other interest groups in the Northwest Valley did not receive copies of the **Combined** Report. We realize that this may be the fault of local **governments** and civic organizations in not responding to correspondence from BLM.

THE END

- 4-4. There are floodplains within the Phoenix RMP area. Floodplain suitability for various uses including recreation will be determined when specific uses or projects are proposed.
- 4-5. Most public land outside the boundaries of the proposed **RCAs** and **CRMA**s has been identified for disposal. Some of the disposal land will be used to satisfy the needs of local communities for recreation and other public purpose land (see Maps 2-4 through 2-10, Appendix 1, and the land status map included with the draft **RMP/EIS**).
- 4-6. Designation of the five communication sites involve planned development through site plans prepared by the BLM. These site-specific plans would address the number of buildings and types of equipment allowed on each site. Also included would be environmental assessments in compliance with NEPA. Designation of these sites would also prevent the proliferation of communication sites elsewhere.
- 4-7. Determinations in the draft **RMP/EIS** were made by the interdisciplinary team identified on pages 167 and 168 of the draft **RMP/EIS**.
- 4-8. The lower Agua Fria Valley encompasses the Agua Fria River between Lake Pleasant and its confluence with New River.

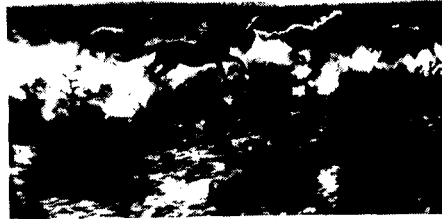
5

INTERNATIONAL SOCIETY  
FOR THE  
PROTECTION OF MUSTANGS & BURROS  
ARIZONA CHAPTER

6212 E. Sweetwater Scottsdale, Arizona 85254

EXECUTIVE COMMITTEE OF THE BOARD OF DIRECTORS

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Linda LeMatre, Membership V.P.  
Rubyn Ferrel, Secretary  
Sharon Bogard, Treasurer



February 23, 1988

Mr. Arthur Tower  
BLM, Area Manager  
2015 W. Deer Valley Rd.  
Phoenix, Arizona  
85027

Dear Mr. Tower:

5-1

I have just received the draft for the Phoenix RMP/EIS on Friday the 19th. In reviewing it in its entirety, I would like to make comment in favor of Alternative B with one recommendation. In regard to the Lake Pleasant Burro Herd, our organization would like to see the herd size increased from 80 to minimum of 130 to protect the viability of the herd. Although, to my knowledge, there is no current data on burro herd viability, there is data available on horse herd viability. A horse herd must have a minimum of 100 horses to prevent in-breeding and deterioration of the stock. I am sure that research would show the same findings in regard to burros.

We are so pleased that the ELM has included the burros in their RMP for the Phoenix area. Many members of our organization enjoy riding and hiking the areas in search of seeing a wild burro.

I am in process of trying to change a conflicting evening appointment, so that I can attend the public hearings on Thursday, the 25th. If I am unable, I would like this letter to be read in my absence, as official comments from our organization. to be entered into the record.

Thank you for your attention.

Sincerely yours,

*Karen A. Sussman*

Karen A. Sussman  
President, ISPMB  
Arizona Chapter

- 5-1. The request for a minimum burro herd of 130 animals is excessive because of the other uses in the Lake Pleasant area. The herd would be managed at 80 burros, the minimum base population needed for maintaining viability according to BLM Burro Program Guidance 1-83, changes 1 and 2.





February 22, 1988

RECEIVED  
BLM, PHOENIX DISTRICT  
PHOENIX, ARIZONA  
FEB 23 1988  
AM 7:18 PM 10:11 12:11 2:12 3:41 5:16

Mr. Artur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

RE: Phoenix Resource Management Plan and Environmental  
Impact Statement

Dear Mr. Tower:

Thank you for forwarding a draft copy of the Phoenix Resource  
Management Plan and Environmental Impact Statement to Maricopa  
Water District.

As the water right holder to the sub flow, flood flow and  
normal flow of the Aqua Fria River and its tributaries, we are  
extremely interested in your management plans.

A number of the Areas of Critical Environmental Concern,  
Special Management Areas, Cooperative Recreational Areas and  
Resource Conservation Areas are within the Aqua Fria  
Watershed.

Thus, we respectfully request your including MWD in all aspects  
of BLM's planning process.

If you have any questions or comments, please do not hesitate  
to call me.

Sincerely,

*Robin E. Barnes*

Robin Barnes  
Management Aide

RB/yb

MARICOPA WATER DISTRICT  
PO Box 260 Waddell AZ 85355  
(602) 9752151



WRITTEN COMMENTS AND RESPONSES

Mr. Tim Sanders  
BLM Phoenix Resource Area  
2015 West Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Sanders:

I am Hiram Davis, the fellow who telephoned you the other day, and whose interest is the preservation of I-17 as the "rural" highway it is today - at least to have it maintain some "rural" character.

Prior to our forthcoming meeting at your office on Thursday, March 3, I wanted you to have these two enclosed items:

(1) copy of remarks which I have made to the Prescott Audubon Society on the candidacy of I-17 for designation as a "Scenic Highway." It lets you know where I am "coming from"; and,

(2) copy of the "Designation Process" from ADOT with which you may well be familiar. Still, I thought, a copy might be handy for ready reference. We, who favor the "Scenic Designation" for I-17, are still at the "Pre-Request" stage.

Yesterday, I was able to pick up a copy of the Phoenix RMP/EIS draft at the state office. I have just begun to read it to find out what is proposed for the land now owned by BLM in the Black Canyon Corridor, particularly if Alternative B (Preferred) were adopted.

My impression is that, under Plan B, the BLM would retain much of the land which it now owns in the Corridor and perhaps even increase its holdings to "block-up" land ownership for more efficient management. But, for what purpose(s)?

The aim of those of us who want to see a "rural" corridor preserved for I-17 - at least between population points, such as between New River and Black Canyon City - is a ribbon of open space, with natural vegetation bordering the freeway and natural vistas preserved where feasible.

I suppose that the only income-earning use for open space, if any, would be light grazing. This would be compatible with vista preservation. However, I argue that an open-space, natural corridor for I-17 would, in itself, add value to the land beyond the corridor, at least for residential use.

Turning to the large folded map labeled "Phoenix Resource Area, North Central Portion" January 1993, I have these questions/comments, moving north from the junction of State 74 and I-17:

(1) Would it be reasonable to aim for a modest open-space corridor between, say the Pioneer Village and the New River Interchange?

The frontage here on both sides of I-17 is largely owned by the state. Hopefully, the State could be persuaded that granting open-space easements along I-17 would enhance the value of the land which the State might lease/sell in this area;

(2) What would seem to be the most effective way to preserve an open-space corridor for I-17 between the New River & Rock Springs interchanges? Especially between the Table Mesa & Rock Springs interchanges?

Any contribution that RLM could make by exchanging with the State? Say, around and to the north and west of the Table Mesa interchange? (Probably provides some of the better scenic vistas along I-17 mountains in the distance and good stands of saguaros in the foreground).

(3) And what about the preservation of saguaros themselves? Arc we at, or at least near, the point where "groves" of saguaros traversed by a major highway are an "endangered" species?

7- For example, is there any stand of saguaros along any interstate in Arizona that can even compare with those which dot the terrain from the Pioneer Village interchange to "topping out" on the mesa just south of the Sunset Point rest stop?

Presumably the preservation of these "groves" would be enhanced if I-17 were designated a "Scenic Highway" but may "something more" be needed? Say, the establishment of some protective zone, perhaps under the auspices/control of the State Parks Board?

(4) I move now to the I-17 segment from the Dog Track/Squaw Peak interchange at the north edge of Black Canyon City to Cordes Junction. Here, if I read the map correctly, the BLM owns the frontage on the west side of I-17, and the State that on the east.

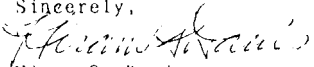
May not this divided ownership lead to an unsatisfactory pattern? Open space on the BLM side and development on the State side of I-17? Are there any potential "block-up" exchange possibilities?

7-2 For example, BLM to get frontage from the State on the east side of I-17 between Dog Track Road and Cordes Junction in exchange for BLM land elsewhere? Such as the BLM land in the vicinity of Black Canyon City and Rock Springs?

7- (5) According to Map 2-13, there are two utility corridors in the Black Canyon planning segment. One follows I-17; the other, along and partly east of the Agua Fria River. From the point of view of preserving scenic vistas from "high-line" clutter, isn't the corridor to the east of I-17 to be preferred?

By enough questions and comments for now. I look forward to visiting with you next Thursday. Should your schedule change, my telephone is 274-2723.

Sincerely,

  
Hiram S. Davis

7-1. The land fronting I-17 between the city of Phoenix and Black Canyon City is or would be administered by the state of Arizona or is under private ownership. The state develops management prescriptions for the long-term maintenance of scenic values on its land.

Public land north of Black Canyon City will be maintained under BLM administration. One of the BLM's long-term management goals for the Black Canyon Resource Conservation Area would be to block up federal ownership in the area through the BLM-state of Arizona land exchange process. This includes land along I-17 between Black Canyon City and Cordes Junction. The proposed RMP has not identified land uses seriously conflicting with the continuation of open space scenic values on public land between I-17 and the Prescott National Forest except placement of additional utility lines in the Black Canyon utility corridor. Impacts on visual and scenic values would be expected to be minimal, however. A traveler's perception of natural scenery would not be affected by the placement of additional utility lines because new lines would be parallel to and screened by existing transmission lines crossing the area.

7-2. The proposed RMP has identified new expanded boundaries for the Black Canyon RMP which include the public land one mile south of the boundary described in the draft RMP/EIS (see RCA Map 2-8 in this document).

7-3. The Alternative B corridor identified in the draft RMP/EIS is preferable due to two factors: 1) there is an existing powerline along I-17 and 2) Alternative C powerlines would further impact a National Register Archaeological District (Perry Mesa).

WRITTEN COMMENTS AND RESPONSES

8

Mr. Arthur L. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Tower:

I read with interest the BLM's desire to consolidate the checkerboard lands it controls. My question is why does the BLM think it can control the lands of the American people anyway?? In the beginning the Lord gave the people the land and the government has chosen to take away from us of our lands, hundreds of thousands and millions of acres throughout the United States. Where do they get the authority? The people of America did not get to vote on this issue. Therefore, I recommend that the BLM land be turned back into the hands of the people of America, the home of the brave and the land that used to be free from government tyranny. Please read and study the Constitution of the U.S. as the founding fathers knew and drew up our rights as citizens, not as subjects, and learn what the God of heaven would have you do to give us back our lands so that you can stand before the Savior on judgement day and be found blameless in trying to help us regain our rights to our lands.

Thank you for letting ☐ state and asking for my opinion. Usually things are accomplished behind closed doors.

I support your efforts in restoring our laws and rights as the original Constitution outlines.

Sincerely,

*Sandra Leonard*  
Sandra Leonard  
PO Box 1526  
Lakeview, AZ  
85929

# Friends of the Hieroglyphic Mountains

8425 N. 56th Ave., Glendale, Az. 85302

March 6, 1988

Mr. Arthur Tower  
Phoenix Resource Area Manager  
BLM  
2015 W. Deer Valley Rd.  
PHOENIX, Az. 85027

Dear Mr. Tower,

The Friends of the Hieroglyphic Mountains wish to make some comments about the draft Phoenix Resource Management Plan and Environmental Impact Statement.

Our preference is for **alternative C**, as it contains proposals for **larger ACEC's** than alternative B.

9-1 Regarding the concept of Riparian Management Area; it is ill defined in the draft and it needs more precise management guidelines, **such** as total restriction of vehicular traffic, etc.

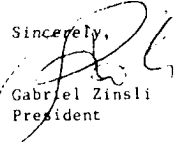
We **also** wish to recommend that all riparian habitats which are still in **some-** what of a natural state and have in-stream flows of at **least** 20 days per year should be **designated** Riparian Management Areas.

9-2 We **also** would have liked to see Owl Head Butte (interesting formation and raptor nesting site) designated as **an ACEC or SMA**.

9-3 Regarding ORV's, we suggest the BLM designate **which** roads will be open to vehi- cular traffic and then print and distribute a map of the Resource Area with such roads shown. As far as the areas closed **to** traffic are concerned, the map **should** specifically detail the penalties involved by trespassing into them with ORV's. Finally anyone caught traveling in **closed** areas or off-road should be prosecuted. Incidentally, we welcome the addition of Desert Rangers-make **sure** they work weekends:

Finally, we believe the BLM should take the **initiative** in the proposed land trades and not wait for the owners to come forward.  
Thank you for **allowing** these comments.

Sincerely,

  
Gabriel Zinsli  
President

- 9-1. Management **goals** and planned actions are described for riparian areas identified for special management. Closed designations are proposed for White Canyon, Larry Creek and Tule Creek. See Tables 2-3 and 2-4 in the **RMP/DEIS** for specifics.
- 9-2. Owl Head Buttes is not public land.
- 9-3. As future funds permit BLM will develop and distribute a public land visitor use map. Off-road vehicle rules and user responsibilities would be described on the map. Site-specific activity planning will evaluate ORV signing needs necessary to achieve ORV management goals. Due to limited funding, intensive signing is initially anticipated only in areas with identified management concerns (**ACECs** and special management areas).

10



United States Department of the Interior  
BUREAU OF MINES

P. O. BOX 25086  
BUILDING 20, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

Intermountain Field Operations Center

March 10, 1988

Memorandum

To: Arthur E. Tower, Phoenix Resource Area Manager, Bureau of Land Management, 2015 West Deer Valley Road, Phoenix, Arizona 85027

From: Chief, Intermountain Field Operations Center

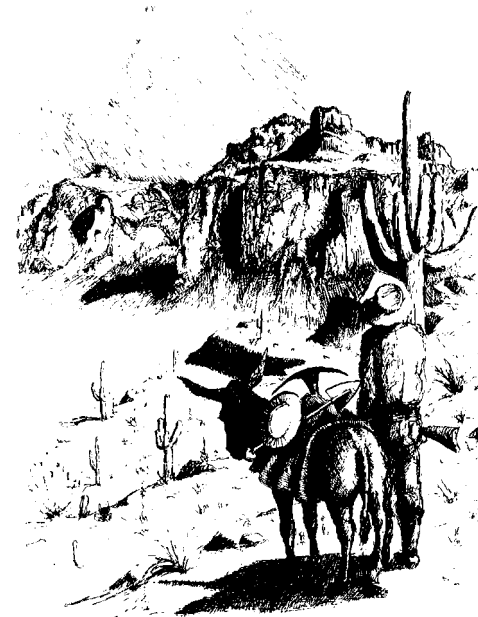
Subject: Draft Phoenix Resource Management Plan and Environmental Impact Statement

As you requested, personnel of the Bureau of Mines reviewed the subject document to determine whether impacts to mineral resources and to related activities are adequately discussed. The draft document presents four alternative plans, including a preferred alternate, for managing the resources of the Phoenix Resource Area. Mineral resource exploration and development have played a major role in the growth of Arizona and have historically contributed much to its economic base. Much of that mineral activity has involved mining districts included in the resource area. Our comments are provided to help clarify or improve the mineral data presented.

The document provides a summary of mineral involvement in the resource area and also a brief analysis of mineral resource impacts by alternative. The maps showing both past mineral-producing areas and contoured densities of currently filed Notices of Intent (NOI) and Mini Plans of Operation (MPO) (p. 96-98) provide information in an easily understandable format. The table summarizing mineral development trends by mining district including base metal production from each district (Table 3-9, p. 100-101) is similarly useful. Because mineral companies currently are actively exploring and developing precious metal properties in the western U.S., we suggest that precious metal production information also be included in the table. Production figures for precious metals are available from the same source as the base metal data quoted in the table (AZ Bur. Geol. and Miner. Technol., Bull. 194).

10-1

The salient mineral resource impact addressed by the document is the de facto withdrawal of lands to mineral entry created by the land disposals proposed under Alternatives B, C, and D. Several areas proposed for disposal currently have high densities of NOIs and MPO's (p. 96-97). We recommend that an effort be made to retain under BLM management two areas having high mineral development potential: the BLM lands south of Tucson and the somewhat more continuous



- 10-1. The interdisciplinary planning team has determined that, as a result of implementing the proposed RMP, the reduction of NOIs from 25 to 12 and MPOs from 2 to 1 would not significantly affect the exploration for and development of marketable minerals in the Resource Area.

block of BLM lands east of Prescott. Because of the recent explosion of interest in precious metal development and the currently higher copper prices, these two areas are undergoing renewed exploration and development activity. Disposal action would create an additional burden for a struggling minerals industry and possibly make exploration and development costs prohibitive.

10-2

For Alternatives B and C, tables are provided (p. 25-26; p.28-30; and p. 35-39) that describe planned action for each special management area (SMA) and for each area of critical environmental concern (ACEC). The specific impacts to mineral resource development by creation of these areas is vague. For example, it is not clear what seasonal or other management restrictions would apply to mineral exploration and development in the Silver Bell Desert Bighorn Sheep Management Area. Tables 2-4 and 2-10 incorporate statements alluding to surface occupancy restrictions on 800 acres of Ragged Top, but no information is supplied regarding what mineral development restrictions would apply to the rest of the acreage included in the SMA. Mineral restrictions on other wildlife SMA's (desert tortoise, burro range) are also ambiguous. As an additional example, several multiple resource management areas limit motor vehicles to existing roads and trails (i.e., Table P-41. Neither the table nor the document make it clear whether a mineral company would be permitted to establish drillroads and drillsites or develop a resource for open pit mining in these areas. In general, the tables list certain access and surface occupancy restrictions but do not clarify whether management restrictions to access would severely restrict these lands to mineral entry. Subsequent versions of the document should elaborate how each management prescription would affect mineral exploration and development activities. A chart or table specifying for each SMA and ACEC the restrictions on locatable and leasable mineral exploration and development would clarify the mineral resource impacts of Alternatives B and C. Maps showing mineral potential superimposed on areas where mineral access would be restricted would also serve to readily illustrate how each SMA or ACEC would impact mineral related activities.

In the Silver Bell Resource Conservation Area (RCA), two SMAs and an ACEC have been proposed for most of the land currently available for mineral exploration and development. Because the area has high to moderate potential for additional mineral discoveries, particularly in the area of the Waterman Mountains ACCC, we believe that access to and permission to develop minerals in this RCA should be maintained as much as possible.

  
William Cochran

10-2.

The impacts to mineral development expected to result from ACEC designations in the proposed RMP would be 1) the requirement of a Mining Plan of Operation for exploration or development in a designated ACEC open to mineral entry, regardless of the acres disturbed and 2) elimination of filing, exploration or development in areas withdrawn from mineral entry. Activities allowed under the general mining regulations would be in force in most areas, including reasonable access to mining claims.

II



## United States Department of the Interior

BUREAU OF RECLAMATION  
ARIZONA PROJECTS OFFICE  
23636 N. 7TH STREET  
P.O. BOX 9980  
PHOENIX, ARIZONA 85068

IN REPLY  
WRITE TO  
780.

330-1000

JUN 2 1987

Mr. Henri Bisson  
Phoenix District Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Bisson:

Thank you for the opportunity to comment on the draft Phoenix Resource Management Plan (RMP) associated with the management of 912,000 acres of public lands in the Phoenix Resource Area. In the RMP, the East Half of Section 11 and the Northwest Quarter of Section 12, Township 15 South, Range 12 East, G&SRM is identified as lands slated for development as a cooperative recreation management area. The lands would be transferred to local governments under the R&PPA for the Saginaw Hill Park.

I I- As you are aware the Bureau of Reclamation is constructing the Central Arizona Project which includes construction of the Black Mountain pipeline. The pipeline will require approximately 3.5 acres of public domain lands located in the West Half of the West Half of the East Half (W1/2W1/2E1/2) of Section 11. This alignment for the Black Mountain Pipeline was identified in our Tucson Aqueduct, Phase B, Draft Environmental Impact Statement dated December 1984, and our subsequent Draft Environmental Assessment on proposed modifications dated December 1987. Copies of both were provided to your office for review.

A formal request for rights-of-way required for the Black Mountain Pipeline within the W1/2W1/2E1/2 of Section 11 will be submitted to you for your consideration soon. We would have no objection to the transfer of public lands, not needed for the Black Mountain Pipeline in Section 11, to other governmental entities under the R&PPA.

Additional comments pertaining to the draft RMP will be provided from our Regional Office located in Boulder City, Nevada. Again, thank you for the opportunity to review the draft plan.

Should you have any questions, please contact Mr. Dennis Burgett at 870-6734.

Sincerely yours,

*Robert J. Towles*  
for Robert J. Towles  
project Manager

11-1. As part of the CAP delivery system, the Black Mountain Pipeline would be allowed under the proposed RMP, subject to mitigation, and would be reserved to the United States in the event that the land would be transferred under the R&PP Act.



15 March 1988  
10120 Clair Drive  
Sun City, AZ, 85351

Mr. Arthur E Tower, Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona

Dear Mr. Tower:

I have made a careful review of the draft Phoenix Resource Management Plan and Environmental Impact Stat-t.

In the preparation of the identified draft the Bureau was faced with the need to make assessments of two classes of holdings subject to quite different pressures--those essentially rural in nature, and those located close to major urban areas. Unfortunately, the Bureau elected to use identical options and assessment techniques for both classes of areas.

The concept of balanced multiple use, including utility corridors, mining, and ranching, is certainly a sound procedure to follow in those areas which are essentially rural. However, in those areas which are adjacent to an expanding metropolitan area it would be preferable to recognize the changes that are likely to take place. Such areas will be subject to much greater pressure for recreational use, their attractiveness for ranching will decline, and they will have increasing appeal as an identified urban resource--such as the Saguaro National Monument at Tucson, the Phoenix Mountain Preserves, and the Lake Pleasant Regional Park.

It would be desirable in the development of Plans for those areas located near urban areas to recognize that the change from a rural to urban environment will not be sudden, and will likely take place over a period of years. Thus, the Adopted Plan should preferably be structured in such a way that it can readily accommodate these changes as they take place.

12-1 The discussion of protection for the desert streams which are included in the plan leaves much to be desired. It is quite probable that the details of these protective measures plans were well known to the authors of the report. However, the report presents few details on how water quality standards will be applied or met, aquatic species protected, or riparian vegetation protected or reestablished. The remaining desert streams in Arizona are certainly deserving of the best management practices that we can formulate.

The administrative organization of the Bureau has injected an additional problem in the selection of a suitable management plan in some instances. For example, the Hassayampa River Canyon and the "upper" Hassayampa River are discussed in two different reports. This is a very undesirable arrangement given the needs for a unified management plan for the River, and the Wilderness potential of the Canyon. The

12-1. The draft RMP/EIS identifies management problems, goals and opportunities. Specific details on methods to achieve the goals are contained in activity plans. The activity plans developed to implement the approved RMP will include environmental assessments and meet public review requirements in compliance with NEPA and the Planning Regulations.

administrative organization **problem** is also reflected in the inclusion of the **Maricopa** Mountain and Butterfield Stage sections in still another **BLM management** report. Despite the size and importance of the Phoenix Metropolitan area these adjacent potential "open space" opportunities are **examined** by **BLM** in three different administrative reports.

The language of the reports with respect to roads and trails and their availability to the public is also imprecise. It would be desirable to identify those roads and trails which will be available to four wheel drive vehicles and/or **ATVs**. It would also be desirable to identify those locations where additional roads or trails might be needed to **accommodate** the needs of these interest groups.

12 It is quite apparent that -unities and organizations in the Northwest Valley had little input in the **development** of the plan or of the several steps which took place prior to plan **development**. This lack of input might be attributed to the small size of the **communities** and to the difficulties of understanding an issue as complex as that faced by **BLM** in the assessment of its land holdings! It would **be** desirable to make a special effort at this time to reach these **communities** and groups to try to determine if they, in fact, understand the importance of the decisions which are being made.

#### SPECIFIC RECOMMENDATIONS:

The **recommendations** of the Plan with respect to those **areas** which are in essentially rural settings seems to be generally adequate.

12-3 Those areas which are adjacent to the **major** metropolitan areas should be reexamined in terms of a fifth alternative--which might be termed Metropolitan Preserve and **Open** Space Management! Under this concept the entire Lake Pleasant Area, which would be better **named** the Hieroglyphic **MountainsArea**, would **be** reconsidered in terms of its long term potential for a **desert/mountain** preserve, and a long term plan would be developed which would reflect the eventual conversion of the area. Such a plan would include the need for additional roads, or improved roads in some areas, camping facilities, a visitor center oriented to the upper **Sonoran** Desert, designated wilderness areas, the eventual phase out of grazing and mining, and perhaps the purchase of the private lands (or conservation easements) which are now located within the area. The time **schedule for such a program might well stretch out over a period of** perhaps twenty years.

The boundaries of the Lake Pleasant area should be readjusted to include the Shitttail Hills area south of State Highway 74 and the **Hassayampa** Canyon Area to the West.

The specific measures which will **be** adopted for the protection and management of the desert streams in the modified Lake Pleasant area should be set forth in considerable detail. An annex to the **report** would be a suitable vehicle for detail of this nature.

A long-range planning and **development committee** for the Lake

12-7. Public involvement efforts, including newsletters, local press coverage, public meetings, and mailings to all affected local governments, were discussed in Chapter 5 of the draft **RMP/EIS**. Most communities in the RMP area have been involved in the Phoenix District's planning effort either directly or through their respective county associations of government.

12-3. The Phoenix District believes the alternatives considered in the draft **RMP/EIS** cover a sufficient range of realistic management opportunities for addressing the recreation issue in the Lake Pleasant area. For example, a cooperative recreation management area surrounding Lake Pleasant a recreation management area in Hells Canyon, a riparian management area along the Hassayampa River and special management areas to emphasize management of watershed, riparian habitat, a resident burro herd and an endangered fish **species** have been proposed. We believe that management emphasis being recommended for these discrete areas is compatible with multiple use management of the entire resource conservation area. Management of the entire Lake Pleasant RCA for the benefit of a single user group would be incompatible with **BLM's** multiple-use mandate.

Pleasant/Hassayampa Canyon area should be recommended. The Committee should have ample representation from the Northwest Valley communities, ranching interests, major developers, the core cities of the Phoenix metropolitan area, Metropolitan Association of Governments, State legislators, and State and County officials.

I believe that adoption of these recommendations will assure that we are planning for the Future of the Metropolitan area and not for the present of the past!

Sincerely

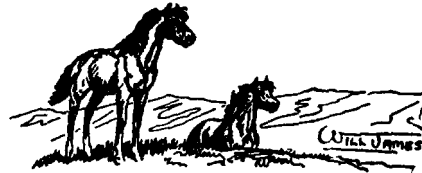
*Eugene Jensen*  
Eugene Jensen

copy:Congressman Stump



**Black Grama**

13



## ELKHORN RANCH

Sasabe Star Route  
TUCSON, ARIZONA 85738

March 25, 1988

Arthur E. Tower  
Phoenix Resource Arm Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Tower

On February 23 I attended the public hearing in Tucson concerning the draft Phoenix Resource Management Plan. Although our feelings and concerns regarding this plan are well known, we have decided to take this opportunity to present them again.

First, we would like to thank you, Tim Sanders, and all others involved for your efforts in keeping us abreast of developments in the plan, and in listening to and taking into account our concerns regarding the plan. For this we are grateful.

13-1 This does not, however, change the fact that we are opposed to the plan in all its various forms. We do not feel a wilderness area in the Baboquivari is necessary. The country is already wilderness due to its topography and will remain so. Access to the mountains is allowed by the area ranchers. It would be next to impossible to develop the area considered for wilderness and most of the land involved is already controlled by the BLM. Therefore, the only effect a wilderness designation would have would be to increase human traffic in the area. The country would lose much of its appeal as this traffic increased. In short, the wilderness designation would result in the area becoming less "wild".

We feel that to establish and run a wilderness area, at taxpayer expense, that results in less remote back-country is fiscally and conservationally unsound. Why not let the area ranchers continue to manage and protect the area from development as they have been doing for years?

13-2 We are also opposed to the proposed swaps between the BLM and State Land Department in the Baboquivari farm our concerns, as stated in prior correspondence, are as follows:

1. We are concerned as to the effect the loss of state lease revenues would have on our local school district.

13-1. The impacts of designating the Baboquivari Peak Wilderness Study Area (WSA) as wilderness are analyzed in the Phoenix Wilderness FEIS. If Congress designates the WSA as wilderness a management plan will be developed. The development of the wilderness management plan would include public involvement and review, address visitor use capacity and would contain an environmental assessment in compliance with NEPA.

13-2. Section 10(b) of the Taylor Grazing Act provides that fifty percent of the grazing fees collected from BLM grazing leases are returned to the State/County where grazing occurs. Pursuant to Arizona State Law (Title 37 ARS Section 724) the returned grazing lease fees are allocated to county school districts.

13-3

2. One of the stated objectives of the plan is to provide access to Baboquivari Peak. The only area that such access is practical is Thomas Canyon. As far as access to the range is concerned, that is already provided by area ranchers.
3. Area ranchers have been around for many years. It would be cheaper and more practical to let them continue to protect the area.
4. The proposed wilderness area would increase traffic, and all the related problems, in the mountains. We do not feel that is desirable.
5. The whole plan runs contrary to the stated objectives of blocking up parcels of land for management purposes. If that were truly an important objective, the BLM would trade out of the area entirely as it is most State Lease Lmd.

In summery, we feel that the most logical course of action in the Baboquivari area is net to take any action. Let's not make an Aravaipa Canyon out of them. They are beautiful, but much of that beauty comes from their remoteness. Lets not spoil that.

Sincerely,

*Charley Miller*

Charley Miller

cc: Glendon Collins, Federal Exchange Administrator

13-3.

Since the proposed Baboquivari ACEC and wilderness study area is surrounded by private and state land, it would be necessary to obtain legal public access.



14

5122 East Citrus Street  
Tucson, Arizona 85712  
March 27, 1988

Arthur E. Tower  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

We have received the RMP and EIS  
Draft for the Phoenix District.

It appears that Alternative B, the  
preferred alternative, would protect and safeguard the  
land for future generations, which is the only criterion  
of any importance.

We do not believe any BLM land  
should be sold for private development, no matter  
how difficult the parcels may seem to manage.  
All BLM land belongs to the American public and  
should be preserved for Americans in all the  
years ahead, not developed, not sold to private  
interests which would put the land off-limits  
to Americans.

Sincerely,  
Walter & Dorothy Pelech



# Defenders OF WILDLIFE

Eugene A. Dahlem  
Bureau of Land Management  
Phoenix Resource Area  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Dahlem:

I enjoyed our brief talks at the recent Desert Tortoise Council Symposium in Laughlin, Nevada. As I said, I was very pleased to see the proposal for a Special Management Area (SMA) for the desert tortoise in the Picacho Mountains in Alternative B of the Phoenix Resource Management Plan and EIS Draft.

After I returned home, I received a topo map of the Newman Peak quadrangle, which included the boundaries of the proposed SMA. Outlined also were four locations of desert tortoise populations studied by the Bureau of Reclamation in connection with the Central Arizona Project canal. I was dismayed to note that all four populations lie outside the SMA boundary.

In further examination of the map, it was obvious that the SMA boundaries are chiefly composed of the steepest portions of the area, and do not extend to the gentler foothills and **outwash** plains where the tortoise populations are found. I assume that this was merely a case of oversight on the part of the BLM, and that changes will be made. I strongly urge that the present boundary of the SMA be extended westward and southward by at least one full section. Even so, one of the tortoise **populations** would have no buffer area.

According to a large-scale land status map of the Picacho area in my possession, Newman Peak is surrounded by state land. If this is the reason for the current proposed boundaries of the SMA, something clearly needs to be done to acquire additional land for the SMA. As I mentioned to you, the state grazing permittee for that area has long been known for persistent trespass, and was fined several years ago for exceeding his permitted use by about five times. Since it is very likely that the current grazing **practices** of this permittee are continuing to negatively impact the desert tortoises in the area, I hope that the BLM will look into the possibility of **working** out some land trades that would result in a further enlargement of the SMA.

If such land trades are a possibility, I will work hard to assist the BLM to make them a reality.

Sincerely,

  
Steve Johnson, ~~Southwest~~

Representative

15-1. The proposed RMP has identified state land for acquisition to include additional tortoise habitat within the Picacho Mountain RCA (see map 2-22 in this document).

Refer also to response 18-7.



## ARIZONA DEPARTMENT OF COMMERCE

ROSE MOFFORD  
GOVERNOR

STATE CAPITOL  
1700 WEST WASHINGTON  
PHOENIX, ARIZONA 85007  
(602) 255-5371

THOMAS P. CALDWELL  
DIRECTOR

MEMORANDUM

TO : DO: BLM

FROM : ARIZONA STATE CLEARINGHOUSE

DATE : April 1, 1988

RE : BUREAU OF LAND MANAGEMENT  
DRAFT PHX RESOURCE MGT PLAN & EIS 15.999  
A2880219800008

This memorandum is in response to the above project submitted to the Arizona State Clearinghouse for review.

The project has been reviewed pursuant to the Executive Order 12372 by certain Arizona State officials and Regional Councils of Government.

The Standard Form 424 is attached for information.

No comments were received on this project or it was supported as written. If any comments are received, we will forward them to you for your consideration.

Attachment

cc: Arizona State Clearinghouse  
Applicant



## MARICOPA COUNTY DEPARTMENT OF PLANNING AND DEVELOPMENT

111 S 3rd Avenue, Room 300, Phoenix, Arizona 85003



BLM PHOENIX DISTRICT

APR 14 '88

April 12, 1988

Mr. Arthur F. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, AZ 85027

RE: PHOENIX RESOURCE MANAGEMENT PLAN

Dear Mr. Tower:

We have reviewed the Phoenix Resource Management Plan and find the alternative acceptable. We can appreciate the need for RIM to consolidate its holdings and designate areas for protection. The Lake Pleasant area is of concern to us, however. We feel this area should be protected to a greater extent by the extension of the RCA to the south and east. Urban and industrial encroachment in this area will greatly reduce the quality of this area. In addition, the area adjacent to Interstate 17 should be included in the Lake Pleasant RCA. These lands would maintain the scenic value of the I-17 corridor between New River and Rock Springs. We are in support of I-17 and State Highway 74 becoming designated as scenic highways. An open space set-back could also be established by the County.

Another concern is the availability of future recreation sites. As BLM reduces its urban fringe holdings, it also reduces the availability of low-cost municipal lands. As the urban growth continues, much land will be needed in the next 10-20 years.

A third concern is the proposal that a large area of land below Highway 74 (Morristown-New River Highway) between Lake Pleasant and Morristown be disposed of to the state or private parties. While we recognize the benefit of an exchange for additional land within the RCA's, this will place a great burden on the surrounding land, given the population that eventually could reside there.

We respectfully request that land ownership and designations in the planning area be more fully addressed to answer our concerns.

Sincerely,

DENNIS W. ZWAGERMAN  
PRINCIPAL PLANNER  
ADVANCE PLANNING DIVISION

*Richard T. Bagley*  
Richard Bagley  
Planner I  
(602)262-3403

DM \_\_\_\_\_  
ADM 10  
PA \_\_\_\_\_  
ADMIN \_\_\_\_\_  
OPS \_\_\_\_\_  
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KRA \_\_\_\_\_  
CF \_\_\_\_\_  
Action By \_\_\_\_\_  
Due Date \_\_\_\_\_

17-1.

The proposed Phoenix Resource Management Plan (RMP) in this document identifies additional land along the Black Canyon Corridor for retention in public ownership, thus enlarging the Lake Pleasant RCA to the east. There are no plans, however, to identify non-public land in the area for acquisition. Land values between New River and Rock Springs make acquisition costs prohibitive when compared to the resource values gained.

The future availability of low cost public land for use by local governments has been addressed in the draft RMP/EIS. During the public scoping process, potential sites were identified by local governments. Several tracts were found to be suitable for transfer under the Recreation and Public Purposes Act (R&PPA). These were identified in the draft plan and carried over as part of the proposed RMP in this document.

The draft RMP/EIS identified the public land south of Highway 74 as suitable for exchange. However, because of public concern about the loss of open space and scenic values in the area, the proposed RMP has identified additional public land south of Highway 74 for retention in public ownership. Specifically, these areas would include sections 25, 26 and the Saddleback Mountain portion of section 35 in Township 6 North, Range 1 West. The retention area would be included within the boundary of the proposed Lake Pleasant RCA.

18

# THE DESERT TORTOISE COUNCIL



5319 Cerritos Avenue  
Long Beach, California 90805

10 April, 1988

Mr. Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

The Desert Tortoise Council sincerely appreciates the opportunity to comment and make recommendations on the draft Phoenix Resource Management Plan. We view some promising changes in the Phoenix District's management through this plan, though some serious mistakes are made in analysis of desert tortoise population and habitat trends under different management regimes, and in planning for the benefit of the desert tortoise.

Our comments are divided into two parts, general and specific.

## GENERAL

18-1 Given that virtually no inventory of desert tortoise distribution or abundance has been carried out in the Phoenix Resource Area, we contest the validity of estimates of habitat extent listed in the document. Though records exist for several areas in the RMP area, only the Picacho Mountains and the Ragged Top area have any extensive data base. How will BLM inventory its remaining areas, and, if they are found to contain major populations, how will BLM give them significant management status if they are not included in this document? What is BLM's schedule for obtaining desert tortoise data in the Phoenix lands? What effort will BLM make to ensure it does not dispose of "important" (we read crucial under BLM's definition) desert tortoise habitat when no inventory has been done? Will BLM inventory habitat slated for disposal prior to consideration for land trades? If BLM does find "important" habitat, will this be cause for careful consideration and probably retention? These questions we have not found answered in this document.

18-2 The RMP doesn't show an analysis of how BLM decided which species and habitats were to be discussed in the RMP. Why were the Picacho Mountains the only area chosen to be significant for desert tortoise management?

18-1. BLM will conduct additional desert tortoise inventories according to recommendations in a Desert Tortoise Implementation Strategy currently being finalized. It is BLM's goal to complete all inventories within five years and to update its Habitat Management Plans and amend this RMP, if necessary, to reach desert tortoise management goals.

18-2. The analysis is found in Chapter 1 beginning on page 6 of the draft RMP/EIS under the section entitled Environmental Issues.

The Picacho Mountains were chosen for desert tortoise management emphasis because they are relatively isolated with limited public access, have few multiple use conflicts and are known to support tortoise populations.

- 18-3 There is not a wide range of alternatives, particularly ones that HLM could be reasonably expected to implement.

Chapter 2 does not develop objectives and management prescriptions very well for ACECs, SMAs, or CRMAs. What is discussed is usually vague and not measurable. Therefore, we cannot follow any analysis HLM may have made on impacts to the desert tortoise.

Chapter 4 often describes actions HLM would take, often seen in this section for the first time in the document. Instead of an analysis of impacts. Our experience with EISs and EIRs is that actions are to be presented in the chapter on alternatives.

#### SPECIFIC

Page 8, paragraph 2. Says alternatives would dispose of Threatened or Endangered plant habitat, again in paragraphs 5 and 6.

- 18-4 Doesn't HLM have a policy not to dispose of Candidate species habitat or cause federal listing? The desert tortoise is a candidate on Category 2, and the U.S. Fish and Wildlife Service has stated that federal listing is warranted, yet BLM intends to dispose of habitat. We see a inconsistency here with national BLM policy.

- 18-5 Page 17. The wildlife and special status plants sections show parts of the plan seem to be contrary to BLM Policies. There is little or no guidance from management on Wildlife. Certainly BLM has management guidance on how wildlife habitat and Threatened and Endangered and Candidate species are to be managed on public lands?

- 18-6 Page 28. The desert tortoise should be added to the Silver Bell Special Management Area as a priority for management. This would be compatible with bighorn and habitat objectives should be developed to benefit the tortoise. The area must not have many conflicting uses if HLM has slated it for bighorn emphasis. This is all the more reason for including the tortoise as a management priority. In addition, HLM has a rare permanent study plot in this area.

- 18-7 We commend BLM on a Special Management Area for tortoises. This kind of action is needed to ensure the future of tortoise in the wild. However, the Picacho Mountains area is much too small to be a "preserve" which would be effective in maintaining a lasting population of tortoises. Additionally, most of the habitat is on lands on the periphery of the RLM land. Consideration of this alternative must not have been made by persons with knowledge of Conservation biology, or "island biogeography." The probability of extinction of a population of tortoises (or other organisms) is roughly inversely proportional to the size of the island. BLM is essentially proposing to create an "island" preserve. BLM

- 18-3. We believe the alternatives analyzed are sufficient to resolve the identified issues. Other alternatives considered and the reasons for their not being analyzed are listed in the draft RMP/EIS beginning on page 41.

- 18-4. The BLM has a policy to manage candidate species to avoid the need for federal listing. Under the Preferred Alternative and Alternative C of the draft RMP/EIS, it was assumed that disposal would be offset by acquisition. Within the range of the desert tortoise, a decision to dispose of candidate species habitat is made only after an environmental assessment is completed.

The U.S. Fish and Wildlife Service definition states: "Candidate Category 2 contains those species for which listing is possibly appropriate but for which the Fish and Wildlife Service does not have sufficient information on hand to support their being listed as threatened or endangered at this time."

Refer also to the General Response to Comments.

- 18-5. As stated on page 20 of the draft RMP/EIS, the identification of land for disposal is not irrevocable. All BLM parcels in an exchange proposal would be subject to a site-specific environmental assessment which would identify and analyze impacts to desert tortoises and other values.

Refer also to the General Response to Comments.

- 18-6. BLM specialists did not identify the Silver Bell Mountains as a priority area for special management of desert tortoises. However, if future monitoring indicates the need, a special management area for desert tortoises in the Silver Bell Area could be designated through a plan amendment.

- 18-7. Several commenters have made the point that the Picacho Mountain Desert Tortoise Management Area identified in the draft RMP/EIS contains too little land mass and/or does not include the lower, state-owned bajadas where tortoise populations are more likely to be found.

Consequently, the proposed RMP has identified 7,980 state-owned acres to be acquired by exchange. Upon completion of the exchange, these acres will become part of the Picacho Mountain Desert Tortoise Management Area (area shown on map 2-22 in this document).

- 18-7 should realize that the main portion of the Picacho Mountains "island" is not on RLM land, and that regardless, AS MUCH LAND AS POSSIBLE should be included in this area for a viable tortoise population. Perusal of maps and data we have acquired shows that at least 24 to 30 additional sections of habitat should be included in the Special Management Area.

BLM's idea of managing the Picachos for the desert tortoise has great merit, but is doomed to failure unless the biological needs of this species are taken into account.

- 18-8 Management prescriptions or actions are vague, especially for wildlife and Threatened and Endangered plants. Without prescriptions, we can not see how HLM can analyze impacts of establishing and implementing management on these areas.

- 18-9 Page 31. Again, there are no prescriptions for CRMAs. The possible range of recreation allowed could greatly change the impacts to wildlife in these areas. Tortolita Mountains have tortoises, possibly in high numbers. There could be highly negative impacts if recreation areas in wrong spots. The Sawtooths, too, may have an "important" population of tortoises, and Hell's Canyon area definitely harbors tortoises, along with other sensitive species, such as Gilbert's skink, yet impacts of recreation are not addressed.

- 18-10 Page 117. Tortolita tortoise habitat is not on Map 3-4a. Perennial forbs and grasses are every bit as important as annuals, especially availability in summer-fall before hibernation.

- 18-11 Page 126. Also pages 142 and 159. Effects on range and management. This is a "inaccurate heading. It has nothing to do with management of range resources (read soil and grass), just livestock management, ranch economics, and animal/ranch performance. Please change the title to what it really is.

- 18-12 Page 137. We take issue that downward trend is expected on 10% of habitat. How did HLM derive this analysis? We believe downward trend will probably be higher, especially at 20 years. the document's "long term." after the population of Arizona has doubled and OHVs, poachers, sightseers, land developers, and the like, has at least doubled also.

- 18-13 What were the analyses for determining what disposal lands would be developed in the long term? For example, most lands near I10 and the CAP would likely be developed, with downward tortoise trends. This would be detrimental to the Picacho Mountains and Silverbell areas, yet this does not seem to be analyzed.

- 18-14 Page 147. Desert tortoise. The document says the Silverbell Area has important habitat. There should be a management goal for the tortoise here, also.

- 18-8. The RMP defines goals for resolving conflicts related to the identified issues. Particular emphasis is placed on management of special management areas and ACECs. The detailed prescriptions describing how the management goals will be met are called activity plans. Activity plans are developed as part of the approved RMP's implementation.

- 18-9. Impacts of implementing the management prescriptions are monitored throughout the life of the RMP and changes can be made if management objectives for desert tortoises are not being met.

- 18-10. The omission was an oversight. The Tortolita Mountains should be indicated on map 3-4a in the draft RMP/EIS as an important desert tortoise area.

- 18-11. Referring to pages 7, 16 and 102 of the draft RMP/EIS under "Effects on Rangeland Management" should help explain this heading. Indirectly, livestock management, ranch economics and animal performance are all important factors in rangeland management.

- 18-12. Downward trend is determined by the interdisciplinary planning team from their analysis of the percentage of habitat expected to be disrupted by development during the life of the plan.

- 18-13. The estimates of future development on disposal land were based on growth trends as we see them now through the estimated life of the RMP (15 to 20 years).

- 18-14. Refer to response 18-6.

18-15 The Picacho SMA does not say anything about restriction of roads, and forbidding roads to communications sites, but chapter 4 does. There are hidden actions in this document that we can not tell will happen. HLM must have a prescription that says no roads in the Picacho Mts. Is the desert tortoise habitat to be acquired blocked up or scattered? Is habitat disposed of blocked or scattered? This makes a big difference with impact assessment. Security of populations in the long term is only made with blocked habitat. The net effect to the tortoise, we feel, is inaccurately stated in this analysis.

18-16 Page 155. Desert tortoise impacts could greatly increase with adjacent state land development and impacts due to habitat loss by visitor facilities, illegal collection, harassment, vandalism, and forage loss. The population would not remain viable through long term, when the cumulative impacts are analyzed. Alternative B would not likely result in a viable population either, but Alternative C represents an accelerated disaster for the tortoise in the Picacho Mts.

18-17 Page 19E. Desert tortoise monitoring. What is a significant change, and who decides when this change (over what threshold) has occurred? The threshold should be quantified in the RMP, as we have seen in others.

We understand that HLM may pick and choose between alternatives, and that Alternative C was not a "real" alternative, in the sense that it would constitute a viable management package on its own. We, the Desert Tortoise Council, therefore urge BLM to implement Alternative C for Communication sites, Larry Creel, Tanner Wash, Waterman Mountain, Silverbell RCA, Perry Mesa ACEC, and the White can yon ACEC. Without implementation of these features into this RMP, measures for sensitive species such as the desert tortoise in many cases would be insufficient and much less effective for resource management into the future. Larger boundaries provided by alternative C for biologically important areas are needed to create manageable units and to manage the upland watersheds, without which, the ecosystems can't be relied on to be maintained. Viable populations can only be maintained on large blocks of habitat. Cumulative impacts must be minimized to the utmost, and this can be improved by larger boundaries. Alternative C for Lake Pleasant Burros would result in 192,000 fewer pounds of vegetation being used yearly, fewer heavily impacted areas near Lake Pleasant and springs and wash bottoms, and less vegetation removal in desert tortoise habitat.

The alternative C management for the Silverbell RCA should recognize the "important" habitat for the desert tortoise and be modified to show management emphasis for the desert tortoise, which, as we stated earlier, should be complimentary to the desert bighorn sheep.

As regards the rest of this planning effort, we recommend im-

18-15. Vehicular access restrictions for the Picacho Mountains Desert Tortoise Management Area are stated in Table 2-4 on page 28 of the draft RMP/EIS.

18-16. Refer to response 18-7.

18-17. Desert tortoise densities would be monitored using the guidelines shown in Table 2-8 of this document. BLM specialists would determine when significant change has occurred.

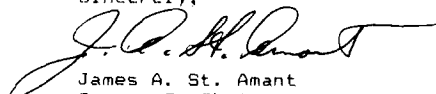
## 18

plementing Alternative B, with modifications desperately needed for the Picacho Mountains Special Management Area.

The Desert Tortoise Council stands ready to assist with development of Special Management Areas and management prescriptions for them. The Council also holds in its membership experts on desert tortoise biology, ecology, conservation area design, size, and management. We would be pleased to assist you with any desert tortoise conservation efforts.

We urge you to build a what you appear to have in mind as active beneficial management for the desert tortoise, but to take these bold steps with a clear knowledge of the resource's biology and a clear charge of establishing areas large enough to maintain viable populations of desert tortoises and other wildlife through the very long term.

Sincerely,



James A. St. Amant  
Senior Co-Chairman

CC: 3 . David Almand, HLM Washington Office

**El Paso**  
Natural Gas Company

April 15, 1989

Mr. Arthur E. Tower, Area Manager  
Phoenix Resource Area  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Reference: Draft Phoenix Resource Management Plan  
and Environmental Impact Statement

Dear Mr. Tower:

El Paso Natural Gas Company (El Paso) operates one of the country's largest natural gas transportation systems, located in the southwestern United States. Since a number of El Paso's pipelines and compressor stations are within the Phoenix Resource Area, we have a vital interest in the Bureau of Land Management's (BLM's) land and resource management planning for the area.

We are particularly interested in BLM's proposal to establish a Tanner Wash Resource Conservation Area (RCA). Three of the seven proposed RCAs identified in the Draft Phoenix Resource Management Plan and Environmental Impact Statement (RMP/EIS) would have El Paso pipelines within them. The pipelines in the Silver Bell and Black Canyon RCAs would be in designated utility corridors; the pipeline in the Tanner Wash RCA would not be.

El Paso's 4-1/2" O.D. Holbrook Line crosses the northeast portion of the proposed Tanner Wash RCA, all of which is also proposed as an area of critical environmental concern (ACEC) for protection of the endangered Peebles Navajo cactus. The lands that El Paso's line crosses are currently owned by the State of Arizona (Secs. 20 and 28, T-18-N, R-20-E) and private parties (Secs. 19 and 27, T-18-N, R-20-E). BLM proposes to acquire these lands in exchange for public lands elsewhere.

El Paso wishes to cooperate in efforts to protect Peebles Navajo cactus and would support establishment of the Tanner Wash RCA/ACEC, provided continued operation and maintenance of our pipeline is not restricted unnecessarily. We request that the proposed Resource Management Plan and Final EIS specifically recognize the need for continued operation and maintenance of El Paso's 4-1/2" Holbrook Line in the Tanner Wash RCA/ACEC.

Mr. Arthur E. Tower, Area Manager  
April 15, 1988  
Page 2

Also, it is possible a second pipeline to Holbrook could be needed in the future, depending on the amount of growth in the area. Should such a pipeline ever be needed, El Paso would prefer to build it parallel to the existing pipeline. We request that, in the Resource Management Plan, BLM retain the option to authorize a parallel pipeline adjacent to the existing Holbrook Line, provided construction of such a pipeline would not harm Peebles Navajo cactus.

Finally, the impact of ACEC designation on operation of El Paso's pipeline will not be fully known until the site-specific management plan for the ACEC is developed. When preparation of that plan begins, El Paso requests the opportunity to participate. El Paso is committed to operating and maintaining its pipeline in a manner that protects Peebles Navajo cactus.

Thank you for the opportunity to comment on the Draft Phoenix RMP/EIS.

Yours truly,

*John A. Sproul, Jr.*

John A. Sproul, Jr.  
Senior Environmental Scientist  
Environmental & Safety Affairs Department

- 19-1. Existing rights-of-way would be honored on acquired land. A second pipeline paralleling the existing one should not negatively impact populations of Peebles Navajo cacti in the area.

The BLM's Phoenix District would welcome the cooperation of El Paso Natural Gas Company in developing a plan for maintaining its pipeline in a manner consistent with the conservation of Peebles Navajo cactus.

20

Dear Mr. Tower:

I Am writing in regards to the Phoenix Resource Management Plan and Environmental Impact Statement Draft.

After studying the document thoroughly, I have concluded the best solution to this most critical of issues is best addressed by Alternative B.

I feel that Alternative B is best suited to address the needs of the six key planning issues associated with the management of the RMP Area's public land.

Hopefully, you will concur with me that the protection of the environment is the most important issue and preserve all these prime areas for future generations.

Thank you,  
John Pampura





April 18, 1988

Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Tower:

I commend you on your efforts to block up BLM lands by trading lands without special values to the public for those that do. Some of the items that you propose that I want to emphasize my support for are:

- 1 - ACEC designation in Alternative B - Tanner Wash, Larrin Canyon, White Canyon, Waterman Mountains, Baboquivari Peak, and Appleton-Whittell Research Ranch.
- 2 - Designation of Coyote Mountains and Hell's Canyon as RMA's as Alternative C recommends if they are not designated wilderness.
- 3 - Obtain legal access to Coyote and Baboquivari Mountains, and Newman Peak.
- 4 - Close Silver Bell/Ragged Top area to oil and gas exploration.
- 5 - Definitely restrict ORV use to roads and trails (Japan ships them to us but restricts them in their own country to two rocky offshore islands).
- 6 - Definitely acquire mineral rights on land you keep.
- 7 - Land to Petrified Forest N.F. is good.
- 8 - Tortolita Mountains land to Pima County for parks is good.
- 9 - Rejection of the 1986 Western Utility Group Study is the right decision.
- 10 - The RCA's recommended in Alternative D are best. Middle Gila Archaeological Zone should be an RCA.
- 11 - The Picacho Mountain's should be an FMA for desert tortoise protection, not a CRMA (however you should consider acquiring adjacent state and private land to include the footprint of the range including the bajadas.)

In addition to the above items, I urge you to change your recommendations to include the following:

- 21-1 - Ragged Top should be expanded to 10,000 acres and made a wilderness area. At a minimum an ACEC. It is an exceptionally pristine Sonoran Desert area.
- 21-2 - White Canyon WSA should be designated a Wilderness area with adjoining Tonto N.F. land and the riparian zone should have special management including the exclusion of livestock.
- 21-3 - Eliminate burros off public land - we don't support kennel dogs and cats with special protection and we shouldn't hunt who are damaging our native species.
- 4 - You frequently mention mitigation in your document. A very abused term. If something must be mitigated - make it genuine, effective, and enforce it. Don't use it just as a meaningless phrase to get around valid requirements that are in someone's way.

21-1. The Ragged Top Wilderness Study Area (WSA) cannot be expanded and recommended for wilderness. Land west and south of the WSA includes private and state land not under wilderness study. Public land in these areas was considered for wilderness study status in 1979 and 1980, but was dropped from further consideration. This public land was found to be unnatural: powerlines, roads, jeep trails and evidence of mining were considered to be substantially noticeable. Moreover, public land south of Ragged Top lacked wilderness character, particularly solitude opportunities.

21-2. The White Canyon WSA is known to have important mineral resources and was not recommended for wilderness by the BLM. BLM studies indicate that potential development of a copper ore body is possible in the future on mining claims presently located in or near the southeastern part of the WSA. White Canyon's outstanding scenic, wildlife and cultural values would be protected as part of an ACEC with ORV travel closed or limited to existing roads and trails and no land use authorizations.

21-3. Refer to response 34-30.

21-4

5 - Cows, God Bless them anywhere but in the arid west. You acknowledge that NEFA requires you to restore and improve rangeland, and to maintain and improve habitat. You acknowledge that ranch values are higher where they have below market value grazing costs on public land. You acknowledge that grazing is negatively impacting wildlife values numerous places. What are you doing to rectify the problem as NEFA requires? Pg. 124 says you may "eventually" have to reduce grazing on lands on a downward trend. Why eventually? The law requires you to do it NOW. Grazing should be eliminated for a while on all POOR and DOWNWARD trend allotments. Reduce grazing on all FAIR allotments. Put all GOOD allotments on a plan to get to EXCELLENT. We don't subsidize other businesses that manage poorly. Why should we subsidize ranchers that have managed poorly and that are wrecking our natural heritage in the process? Exclude livestock from all riparian areas - what little is left is far too precious to waste on livestock.

Thanks for your consideration of the above input. I realize you are under a lot of pressure from special interests, but don't forget you are supposed to be managing public land for the American public in perpetuity.

Gracias y hasta luego.



Jim Notestine

P.O. Box 451  
Sondita, AZ 85637

21-4.

Grazing management for the Phoenix Resource Area has been addressed in the Range Program Summary • Record of Decision for the Eastern Arizona Grazing FEIS. The proposed RMP for the Phoenix Resource Area states prescriptions which would affect grazing management in several **SMA**s and the Larry Canyon ACEC. Grazing use and rangeland condition would be monitored throughout the Resource Area. This information would provide data needed to make decisions concerning livestock adjustments.



## The Arizona Nature Conservancy

300 East University Boulevard, Suite 230, Tucson, Arizona 85705  
(602) 622-3861

April 18, 1988

Mr. Arthur E. Tower  
Phoenix Resource Area Manager  
2015 W. Dear Valley Road  
Phoenix, AZ 85027

Dear Mr. Tower:

In response to your Draft Phoenix Resource Management Plan and Environmental Impact Statement, The Arizona Nature Conservancy submits the following comments. In accord with the major emphasis of our organization, our comments are directed towards proposed management actions related to sensitive plants and animals and • igniflcst natural areas.

### SENSITIVE PLANT AND ANIMAL SPECIES

- 22-1. We strongly support the proposed southern boundary area for the White Canyon RCA. Acuna Valley cactus, (*Echinomastus erectocentrus* var *acunensis*), a Category 1 plant known from only three populations, occurs along the edges of Box-O Wash within the proposed RCA boundary area. We • trngly • upport Alternative B boundary area for this RCA as it contains More potential habitat for the plant.
2. We strongly support your proposal to retain 640 acres of *Astragalus xiphoides* habitat adjacent to Petrified National Monument.
- 22-2. 3. Your proposed action appears to have the potential to impact several listed species. We request that a formal Section 7 consultation be initiated with the USFWS. The DEIS is not adequate as a biological assessment of how the BLM decided that particular T&E • peciar and/or their habitats would not be significantly impacted.
- 22-3. 4. We request that all tract.8 which contain perennial sections of stream that support Little Colorado River spinedace be retained in public ownership. The public land along Silver Creek is the Only land below the town of Silver Creek in federal ownership. Disposal of these tracts would seriously undermine any future recovery measures that can be undertaken while the land is in public ownership (e.g.

22-1. The boundaries of the White Canyon RCA have been revised in this proposed RMP to exclude the area of Box-O Wash where the Acuna Valley pineapple cactus is known to occur (see White Canyon RCA map 2-7 in this document). The State Land Department has identified the state land in the area for retention to benefit the State School Trust. Since the state land is not available for exchange, there is no opportunity for the BLM to acquire Acuna Valley pineapple cactus habitat.

22-2. The BLM's Phoenix District is aware of its responsibilities under the Endangered Species Act. Appropriate consultation is initiated with the U.S. Fish and Wildlife Service on any pending actions which may affect federally listed species or which are likely to jeopardize a species proposed for listing.

Refer also to the General Response to Comments on Section 7 consultation.

22-3. Any future recovery efforts to benefit Little Colorado River spinedace in Silver Creek would require the cooperation of non-public landowners along 92 percent of the creek. The BLM's Phoenix District initiated consultation with the U.S. Fish and Wildlife Service in June 1988 to study the question. Pending the outcome of the consultation, the Silver Creek parcels will remain in public ownership.

Formal listing of the Little Colorado River spinedace occurred as the draft RMP/EIS was being printed. The current threatened status of the species is noted in this document.

instream flow protection) and could necessitate future expenditures of public dollars. Please note that this species is now listed threatened.

#### AREAS OF CRITICAL ENVIRONMENTAL CONCERN

1. We commend your proposed action which is to recommend to designate seven sites as Areas of Critical Environmental Concern. As you are undoubtedly aware this is the first draft RMP which proposes to designate ACECs in Arizona. Bravo!

22-4 2. Implement Alternative C for the Perry Canyon ACEC within the final preferred action and expand this ACEC boundary area to include portions of Silver Creek as depicted on the enclosed map. This short mention of perennial water provides habitat for Gila intermedia, a federal Category 2 fish known from fewer than 20 items in the state and an exemplary riparian habitat which includes cienega, a globally threatened plant community, bordered by deciduous broadleaf riparian forest.

22-5 3. A more informative presentation is necessary for the public to understand why certain areas were not evaluated for ACEC designation as stated on page 42. Although we nominated two sites for consideration, we were never formally informed as to the reasons why the Tule Creek site was rejected. We recommend that a more in-depth analysis be presented as to why areas were rejected. This will provide the public with an opportunity to further document the importance or relevance of each site.

4. We strongly support the proposed Tanner Wash, Waterman Mountain and Appleton-Whittell ACECs. We also strongly support the Larry Canyon ACEC with the above noted recommendation.

#### RESOURCE CONSERVATION, SPECIAL and COOPERATIVE RECREATION MANAGEMENT AREAS

22-6 1. It is not clear how the SMAs in Table 2-4 relate to the Maps on pages 67 - 81. Please clarify.

22-7 2. Include protection of ecological values of Tule Creek in the management goals of the Williams Mesa MRMA.

22-8 3. Your inclusion of such a voluminous list of SMAs suggests that you are moving towards a National Forest LNP

22-4. The proposed RMP has adopted the draft RMP/EIS preferred alternative ACEC boundaries within the Black Canyon RCA. Upon acquisition, the Silver Creek area of Perry Mesa would be managed following BLM riparian management guidelines.

22-5. The two formal ACEC nominations submitted by the Nature Conservancy (i.e., Nichol Turk's head cactus habitat and Tule Creek) were the only ones received from the public. The Nichol Turk's head cactus nomination has been incorporated into the proposed Waterman Mountains ACEC. The Tule Creek nomination was evaluated by the interdisciplinary team and found to be lacking in qualities associated with ACEC designation. The presence of an introduced population of the endangered Gila topminnow gives the area relevance, but the removal of the population by flooding has occurred in the past, thus seriously limiting the importance of the area for topminnow. The presence of a small cienega is interesting, but not unique, and cannot be considered a remnant of riverine cienegas which have largely disappeared because of channeling and dewatering.

22-6. The deficiency has been corrected in this proposed RMP/FEIS document.


22-7. As part of the Williams Mesa Special Management Area, consideration of Tule Creek would be included in the activity plan developed for the area.

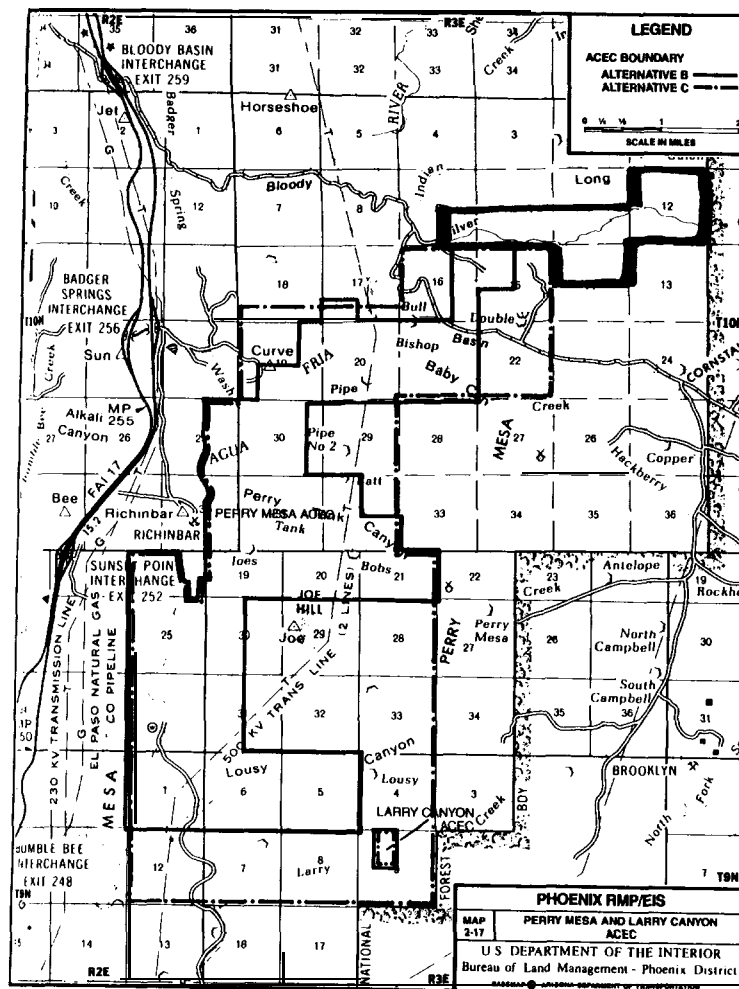
22-g. The BLM's Phoenix District expects to reach the management goals proposed. Dividing the entire resource area into management units has been tried in the past and found to be inferior to the Resource Management Plan.

- 22- approach which divides the Forest into various management units. If this is the case, why not be more complete and include all the lands that are managed by the Resource Area? While I find your intentions to develop activity plans for each SMA commendable, realistically we question the ability of the BLM, given various time and resource constraints, to actually develop these plans.
4. We are concerned about the proposed CRMAs. While in certain narrowly prescribed instances joint ☐ agreement of public lands is beneficial, the large scale approach proposed here seems dangerously excessive. A cynical perspective would be that CRMAs are a creative variation on the public land disposal program proposed in the early 1980s (i.e. the "Sagebrush rebellion").
- 22-9 On pgs. 31 the document states that these areas have been identified for "intensive recreation uses" and that each area would be jointly managed based upon a cooperative management agreement between the BLM and county or state parks agency. We question the appropriateness of targeting areas for intensive recreation uses without a careful evaluation of the impacts of such uses. We also are concerned about the level of public input that we can anticipate when such cooperative management agreements are developed.
- 22-10 With in mind, we request that Alternative C for the Silver Bell RCA and that the Sawtooth Mountains be dropped from further consideration as a CRMA. We would not be opposed to a modification of Alternative C to use the Alternative B boundary area on the east boundary of the RCA.
- 22-11 5. The proposed Picacho Mountain Desert Tortoise Management Area, while commendable is inadequate given the habitat currently included in the proposed boundary area. We recommend that the BLM develop boundaries that include more optimal tortoise habitat and identify those areas for acquisition. We suggest the southern and eastern boundaries be expanded to include more of the mountain bajada.
- 22-12 6. We recommend that the boundary area for the Black Canyon RCA be expanded to include E 1/2 S 6 T12N R3E and SW 1/4 S 31 T13N R3E. This would ensure that the entire perennial stretch of Ash Creek is protected in federal ownership. 27.5 miles of riparian habitat currently in public ownership are slated for disposal under your preferred action and we urge you to aggressively offset these losses by identifying
- 22-9. We do not agree that creation of Cooperative Recreation Management Areas (CRMAs) results in public land disposal. The public retains ownership of the CRMA and management of these areas would be consistent with federal environmental protection laws and regulations.
- 22-10. The request has been noted. Considering the needs of local communities for open-space and developed recreation areas, however, the BLM has incorporated the draft RMP/EIS preferred alternative proposals for CRMAs into the proposed RMP.
- 22-11. See comment 18-7.
- 22-12. The potential loss of riparian habitat under the preferred alternative is more than offset by the proposed acquisition of 53 miles of riparian habitat representing a potential 36 percent increase.

22

Sincerely,

Sincerely,  
  
 Andy Laurenzi





DEPARTMENT OF THE AIR FORCE  
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)  
630 SANSOME STREET - ROOM 1316  
SAN FRANCISCO, CALIFORNIA 94111-2278

4 2 807

1 3 3 ROVP (Tye/556-0557)

SUBJECT Phoenix Resource Management Plan & Draft Environmental Impact Statement (DEIS)

10 Mr. Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

23-1

1. We appreciate the opportunity to review the subject DEIS and offer the following comments:
- As shown on the attached map, the three Resource Areas evaluated in your DEIS (North Central Portion, South Central Portion, and Apache-Navajo Portion) are subject to numerous military overflights in their vicinity in the form of VFR and IFR training missions. Inasmuch as military overflights do have the potential to occasionally disrupt the solitude and naturalness of areas directly under their flight paths, we recommend you include consideration of such activities in your discussion and decision-making process. Within that context, we further recommend you consider location, altitude, and frequency of flights.
  - Areas which are appropriate for military overflights and low altitude training routes are becoming increasingly rare. In selecting overflight training routes, the Air Force must consider mission requirements and fuel costs as well as environmental constraints. Ideally, training routes are located within areas which: are relatively isolated, have diverse topography and minimal commercial activity, maintain sparse human populations, and contain lands under federal jurisdiction. It is obvious that these characteristics are also compatible to a large degree with potential wilderness areas. Therefore, even though several of the areas being proposed are subject to air training activities, the Air Force generally supports designation of wilderness areas provided such designations, and subsequent management thereof, do not restrict use of the airspace for military overflights.

2. We hope these comments are useful in your planning process. If we can be of assistance in any manner, please contact the undersigned or Mr. Michael Tye at (415) 556-0557.

*Phillip E. Lammi*  
PHILLIP E. LAMMI, Chief  
Environmental Planning Division

1 Atch: Training Route Map  
cc: AF/LEEVN (Fordham)  
AFREP/FAA

- 23-1. There is no specific prohibition of military overflight above designated wilderness areas by aircraft on essential military training missions. Where low overflight is or is expected to become a concern, wilderness management plans would provide for liaison between the BLM and the military to resolve any overflight problem.

24



BLM PHOENIX DISTRICT  
NATIONAL PARKS AND CONSERVATION ASSOCIATION

APR 25 '88 Southwest-S-California Office  
Box 67, Cottonwood, Arizona 86326  
(602) 634-5758

RUSSELL D. BUTCHER  
Southwest-S-California Representative

DM \_\_\_\_\_  
PA \_\_\_\_\_  
ADMIN \_\_\_\_\_  
OPS \_\_\_\_\_  
MINS \_\_\_\_\_  
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P&EA \_\_\_\_\_  
PRA \_\_\_\_\_  
LGRA \_\_\_\_\_  
KRA \_\_\_\_\_  
CF \_\_\_\_\_  
Action By \_\_\_\_\_  
Due Date \_\_\_\_\_

April 21, 1988

RE: BLM's PHOENIX DRAFT RMP/EIS

Mr. Arthur L. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Tower:

National Parks and Conservation Association, a nonprofit membership organization, founded 69 years ago to promote the protection, enhancement, and public understanding of the national park system and related public lands, appreciates this opportunity to offer a few comments on the December 1987 Phoenix RMP/EIS Draft.

In general, we support and are pleased with Alternative B (Preferred Alternative).

... to consolidate ownership and intensively manage lands within seven Resource Conservation Areas (RCAs);

... to transfer up to 4,000 acres of BLM lands to Petrified Forest National Park;

... to consolidate surface and subsurface estates through acquisition by exchange of nonfederal mineral estate underlying federal surface holdings--to retain federal subsurface mineral estate and acquire through exchange all nonfederal subsurface estate within RCAs, CRMAs, and R&P Pleases;

- to enhance and protect some 74 miles of RMP areas' riparian habitat and acquire some 54 miles of state-owned riparian habitat within RCAs;

- to route utilities' facilities either along existing utility systems or so as to avoid known high natural or cultural resource areas;

- to establish six Areas of Critical Environmental Concern (ACECs) encompassing 9,971 acres; and expand the Perry Mesa ACEC upon acquisition of state lands--these six ACECs



being Baboquivari Peak, Waterman Mountains, White Canyon, Larry Canyon. Tanner Wash, Appleton-Whittell, and Perry Mesa;

● to establish 19 Special Management Areas; and

● to close some 11,760 acres and b.5 miles of existing roads/trails to motorized vehicles--within ACECs and SMAs.

Regarding the ACECs, we do question whether Alt. B offers a large enough area to provide comprehensive protective management of White Canyon. We normally view such areas as benefiting from topographically/hydrologically oriented boundaries. While Alt. B's boundary encompasses the heart of White Canyon, it does omit some of the tributary drainages leading into White Canyon--notably in Sections 10 and 15. The White Canyon ACEC would, it seems to us, be more complete as an ecological unit were it to include not only those two sections, but the northern one-half of Sec. 22, sec. 12, and the three-quarters of Sec. 13 not inside the Alt. B boundary. This would add about 2,720 acre\* to Alt. B's 2,400 acres for a total of about 5,120 acres.

We support the Tanner Wash ACEC and hope that an agreement can be reached by which the National Park Service (Petrified Forest National Park) can be given protective management authority over this critical habitat of the Peebles Navajo Cactus (Pediocactus peeblesianus, var. peeblesianus), a federally listed endangered species, and the Sword Milkvetch (Astragalus xiphoides), a candidate for federal listing. (Incidentally, on page 145 are two references to the "U.S. Park Service," which should be changed to "National Park Service.")

We enthusiastically support the Perry Mesa ACEC, and the related goal of exchanging state lands out of 8,480 acres of this vicinity. We do not understand, however, why lands acquired from the State of Arizona would be opened to mineral leasing/sales. It is our understanding that at least some of those state lands also contain significant archaeological resources; that such lands ought to be withdrawn from mineral entry; that the existing "National Register Archaeological District" should be expanded; and that BLM should implement a program of protective management of this entire, expanded cultural resources district. The ruins of "a large complex of Pueblo-like communities" (containing villages of more than 200 rooms each) built along the middle Agua Fria River (in Agua Fria and Squaw Creek canyons) by A.D. 1200, as well as evidences of other archaeological resources, clearly merit greatly enhanced protection from vandalism, looting, and other kinds of impairment. This protective management will predictably become increasingly vital as Black Canyon City, Phoenix, and other cities continue to grow rapidly.

24-1

24-2

Regarding the proposed Larry Canyon ACEC, we would simply suggest that it be joined to nearby Perry Mesa ACEC so that the manageability of that area of ACEC-worthy resources may be simplified.

#### Comment Letter No. 24

- 24-1. The BLM's Phoenix District would prepare a Cultural Resource Project Plan for the Perry Mesa ACEC upon designation. The BLM would state specific measures (including anti-vandalism measures) to protect and enhance the cultural values on Perry Mesa.
- 24-2. The proposed RMP in this document identifies Larry Canyon and Perry Mesa as two ACECs. The special features of each area are so different that each deserves separate recognition.

24

In the context of Alt. C's Perry Mesa ACEC discussion, **we oppose** that option **that** would allow construction of additional transmission lines so as to visually impair the National Register Archaeological District. Thus, Alt. B is preferable.

We also support OKV restrictions within all ACECs to existing readily definable roads. This constraint on ORV travel is particularly urgent within the Perry Mesa ACEC. In fact, we urge that, where possible, roads/trails that demonstrably or probably relate to cultural resource vandalism/looting be closed within the ACEC or on adjacent lands. Careful monitoring is, of course, a fundamental part of enhanced protective management. We understand that cooperative overflight surveillances of the Perry Mesa pueblo ruins are periodically carried out; we commend the Bureau of Land Management for this effort and urge it be continued, in concert with other kinds of monitoring. Are there volunteers (private individuals such as local ranchers) who can become part of a regular monitoring/networking system? We urge that the RMP/EIS document be expanded to indicate protective management of cultural resources in this and other ACECs, RCAs, and other areas.

We are really pleased with the proposed ACEC designation of BLM lands within the National Audubon Society's Appleton-Whittell Biological Research Sanctuary, and plans to manage those public lands cooperatively with the Research Ranch.

Regarding the stunningly scenic Baboquivari Peak ACEC, we hope BLM will in the future be able to expand this area--possibly through land exchanges, donations of property, or purchases of lands adjacent to the ACEC in Altar Valley. The presently proposed section-line boundary along the ACEC's east side does not provide a topographically/hydrologically or administratively logical unit. We hope eventually the ACEC can be extended eastward a mile or so, bringing in the ecologically important upper reaches of Sabin and Brown canyons; and perhaps extended southward, as well, to include the upper reaches of Thomas and Weaver canyons. It would be further of great benefit for BLM eventually to acquire the Altar Valley ranch lands all the way eastward to Highway 286, so that the magnificent panorama of Baboquivari Peak and adjacent summits of the range can be permanently protected.


Finally, regarding two of the proposed Special Management Areas: (1) we fully support BLM/State of Arizona's stare Land Department's efforts, as part of the "Santa Rita Exchange," to

seek a" exchange of some 60,000 acres of state trust lands out of the Black Canyon Resource Conservation Area and its two proposed Special Management Areas; and (2) we likewise support a similar exchange of some 16,000 acres of state lands out of the area around Lake Pleasant, within the Lake Pleasant Resource Conservation Area's Special Management Areas. The Black Canyon Corridor and Lake Pleasant area are both highly scenic landscapes, containing outstanding geological, ecological, and cultural resources. The Hieroglyphic Mountains area of the Lake Pleasant RCA is a particularly outstanding and rugged Sonora" Desert landscape which, without special protective management by the BLM, would be almost surely in the path of rapidly expanding Phoenix. We only wish there were a way to add more or even all of the beautiful desert lands stretching farther west along the north side of Route 74...to the junction with Highway 60/89.

As for the Black Canyon RCA, this is an unusually scenic and ecologically important stretch of country reaching from the northern end of the Sonoran Desert, northward and onto the high-desert, lavaflow-capped mesa land high above Black Canyon. We commend BLM for working with the State of Arizona to bring these public lands all under federal management.

Again, our thanks for this chance to offer a few of our comments.

Sincerely,



Russell D. Butcher  
Southwest-h-California Representative  
Box 67, Cottonwood, AZ 86326

RDB/prb

cc : D. Dean Bibles



20 April 1988

Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

The Prescott Audubon Conservation Committee is pleased to respond to the DRAFT of Resources Management Plan & Environmental Impact Statement, December 1987, issued by the Phoenix District Office of the U.S. Bureau of Land Management.

Position

The Prescott Audubon Society endorses the concept of "blocking up" the ownership of public lands under the management of one entity, as set forth in the DRAFT Plan.

In the application of this concept, we further endorse the proposed establishment of the Black Canyon and the Lake Pleasant Resource Conservation Areas (RCAs) as delineated on Maps 2-S and 2-9, pages 52 and 53 of the DRAFT Plan, except that we urge:

- 25-1 (1) Extension of the eastern boundary of the Lake Pleasant RCA to the east of I-17 to include the lands there which give special scenic value to the portion of I-17 between New River and Rock Springs--specifically from the first east-west section line south of the Table Mountain Interchange north to the Maricopa County Line;
- 25-2 (2) Location of the southern boundary of the Black Canyon RCA at the north side of Dog Track/Squaw Peak Road instead of one mile north--at least for one-half, and preferably one mile on each side of I-17; and,

25-1. Refer to response 17-1.

25-2. The southern boundary of the proposed Black Canyon RCA and the eastern boundary of the proposed Lake Pleasant RCA have been expanded to include most of the described land. See maps 2-8 and 2-9 in this document

## PAS Conservation Committee 2

- 25-3 (3) Review of the utility corridors proposed in the Black Canyon RCA to find a route for any additional line(s) which would neither compromise views from I-17 nor intrude archeological sites on Perry Mesa.

Explanation

In urging these modifications, we are looking forward to I-17 being designated a "Scenic Highway" by the Arizona Department of Transportation, acting under ARS 41-412 through 41-518.

Our Conservation Committee is proposing that the Prescott Audubon Society participate in and support a coalition of other concerned private and public entities that will in the near future request to designate I-17 a "Scenic Highway"--probably from the junction of I-17 and State 74 at the Carefree/Wickenburg Interchange north to the city limits of Flagstaff. We expect our participation to be led by Prescott Audubon Society member Hiram Davis, who has done substantial groundwork in exploring the issue.

W&Extend Lake Pleasant RCA Eastward

The extension of the Lake Pleasant RCA to encompass the presently-owned BLM and State lands--traversed by I-17 between the east-west section line one mile south of the Table Mountain Interchange and the Maricopa County Line (just south of Rock Springs)--would insure the survival of one of the most scenic desert landscapes to be viewed from a major highway in Arizona.

Though extraordinary views will be retained for travelers on I-17 by the establishment of the Black Canyon RCA, the desert portion below the Sunset Rest Stop is one of transition--from desert to semidesert grassland--in terms of vegetation. In contrast, the landscape south of Black Canyon City is representative of the true Sonoran Desert, and especially noted for its many stands of saguaros. Thus the extension of the Lake Pleasant RCA eastward to assure the survival of this scenic desert area is surely warranted; it is also practicable.

Much of the land in question is already owned by BLM and is contiguous with land which the BLM has marked for retention in the proposed Lake Pleasant RCP. In addition, the BLM is already planning to retain ownership of some land east of the proposed boundary of the Lake Pleasant RCA in order to insure the continuance of the Black Canyon Hiking and Equestrian Trail.

- 25-3. The proposed RMP in this document includes the utility corridors identified in the preferred alternative of the draft RMP/EIS. Restricting future facilities to parallel the existing corridor along I-17 is the environmentally preferred solution.

## PAS Conservation Committee 3

Why Change Southern Boundary of the Black Canyon RCA

The placing of this boundary approximately one mile north of the I-17 Interchange with the Dog Track/Squaw Peak Road, as proposed in the DRAFT Plan, risks development on the north side of this Road, and to the north along I-17, which could detract significantly from this re-entry/departure point for the Black Canyon RCA portion of "scenic" I-17.

Why not forestall an almost certain "distraction problem" for the Yavapai County Board of Supervisors by setting the boundary of the Black Canyon RCA approximately one mile farther south than non planned? Namely, the north side of the ROW for the Dog Track/Squaw Peak Road.

This portal" protection, which we feel to be essential, could probably be accomplished by dropping the present planned boundary of the Black Canyon RCA to the Dog Track/Squaw Peak Road far one-half to a mile on each side of I-17. Otherwise, the boundary proposed (per Map Z-24, page 72) could probably remain unchanged--unless there were cogent reasons to the contrary.

Why Review Utility Corridor

BLM appears to have decided to locate the next transmission line(s) in the Black Canyon RCA in the vicinity of I-17 (per page 42 of the DRAFT Plan).

We ask for a review of this decision for the purpose of finding a location for the next transmission line(s) which would least impair the scenic-view experience from I-17 and yet not intrude significant archaeological sites, such as those on Perry Mesa.

Concluding Comment

The Prescott Audubon Society much appreciates this opportunity to comment on the DRAFT Plan of December 1987 and to offer suggestions on this forward-looking program for the selective retention of lands under BLM ownership, coupled with the acquisition, by exchange, of lands owned by the State of Arizona to round out "resource-conservation areas" for effective resource management.

We are especially pleased with the application of this concept to the proposed creation of the Black Canyon RCA, lying between Black Canyon City and Cordes Junction and bordered on the west by the Prescott National Forest and on the east by the Prescott and Tonto National Forests.

## PAS Conservation Committee 4

In this connection, we note, with approval, the proposal to designate "Areas of Critical Environmental Concern" for special protection, including Larry Canyon and Perry Mesa in the Black Canyon RCA.

We would urge that full consideration be given to the concerns addressed here, and would encourage full discussion of these concerns with our Informed Prescott Audubon member:

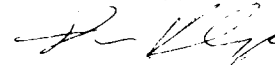
Hiram Davis  
Box 33085  
Phoenix, AZ 85067  
274-2723

0

1030 Scott Dr.  
Prescott, AZ 86302  
445-8583

Thank you again for the opportunity to comment.

Sincerely,



Donn Rawlings,  
Prescott Audubon Conservation Committee Co-Chair

PALL B. BELL  
DONALD M. SELTZER  
CHARLES B. PARK III  
RICHARD T. BISH  
SAMUEL S. LAYTON JR.  
JILLIAN E. DAVIES JR.  
JOSEPH H. BURKE  
CHARLES B. ELLERBY  
JOHN J. SULLIVAN JR.  
JOHN J. BARNHART III  
RAYMOND C. LUTHER  
JAMES D. WIEBS  
RICHARD S. FAUST  
MICHAEL D. MCGO  
BLAS B. ANDRUS  
JOSEPH W. HEARL  
JIM E. SUMER  
KENNETH S. BUEY  
D. KENSON M. LIPP  
RICHARD V. ARTHUR  
F. MICHAEL SAUCIER  
JOHN H. THOMAS  
BARBARA A. CALDWELL  
MARTHA S. HUGHES

BELL, SELTZER, PARK & GIBSON  
A PROFESSIONAL ASSOCIATION  
ATTORNEYS AT LAW  
201 EAST MOREHEAD STREET  
P.O. DRAWER 34209  
CHARLOTTE NORTH CAROLINA 28234  
704 377 5656

April 25, 1988

NOTICE OF FILING OF THIS LAW  
OFFICE OF THE ATTORNEY GENERAL  
STATE OF ARIZONA  
KING OF THE ARIZONA BAR  
THE ARIZONA BAR ASSOCIATION

ARIZONA BAR  
NATIONAL BAR  
ARIZONA BAR  
ARIZONA BAR  
ARIZONA BAR

TELEPHONE 22  
TABLE CHAIRMAN

CHARLOTTE TELEPHONE  
104 114 20 4 0111 III  
DALE SH TELEPHONE  
4 9 014 4326 0111 III

EXPRESS MAIL

Mr. Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Re: Draft Phoenix RMP/EIS

Dear Mr. Tower:

I am pleased to have received from the BLM the draft Phoenix Resource Management Plan and Environmental Impact Statement. Please keep my name on your mailing list.

My partner (Harry Turner of Tucson) and I own Lots 1-5 of Section 1, T9S, R6E, Lot 17 of Section 1, T9S, R6E, and NE 1/4, Sec. 9, T9S, R6E (excepting NE 1/4 NE 1/4 NE 1/4), all lying within the Silver Bell RCA (Alt. C). We present our remarks hereinbelow upon two assumptions, namely: (1) that our access to our land shall be undiminished under any of the four proposed alternatives: and (2) that the present and potential future use of our land shall be undiminished under any of the four proposed alternatives, as such. If our assumptions are in any way incorrect, we call upon the BLM to promptly so state.

Equivalent assumptions were stated in my letter of December 29, 1986 to Mr. Tim Sanders of the BLM, no response to which was ever received. I further refer to my earlier letter of December 8, 1986, and, as well, to the comments in my letter to Mr. Sanders of May 27, 1986.

Turning now to the four alternatives set forth in the draft RMP/EIS, we consider Alternative D to be completely unacceptable. The general availability of public land is one of the main factors which sets Arizona apart from most other states, and provides resident and visitor alike with a quality

26-1. Proposals presented in the draft RMP/EIS and the proposed RMP/FEIS apply only to BLM-I-administered land.

BELL, SELTZER, PARK &amp; GIBSON

Mr. Arthur E. Tower

-2-

April 25, 1988

of life substantially superior to that found in, for example, west Texas, which we understand to be almost entirely privately owned.

Alternative A we find not unacceptable, although we understand the benefits to be derived from efficiencies in managing areas which are not so scattered as the current BLM land pattern. We would have no objection if Alternative A were to be adopted. However, we do agree that either Alternative B or Alternative C is to be preferred.

As between Alternative B and Alternative C, we believe Alternative C to be slightly better from a public point of view, since more BLM land would be retained, and since, as we understand it, such land would be less "intensively managed" than under Alternative B. Said another way, we think Alternative C presents the public with more land to use recreationally with more freedom at somewhat less cost. Alternative B would, of course, be acceptable as well.

Substantially, we agree completely with the BLM proposal for continued vehicular access on existing roads and trails, with only the minimal closures envisioned in aid of very special conservation situations. Further, we continue to urge that within the RCA (either Alt. B or Alt C), both mining and grazing activities be minimized, if not eliminated.

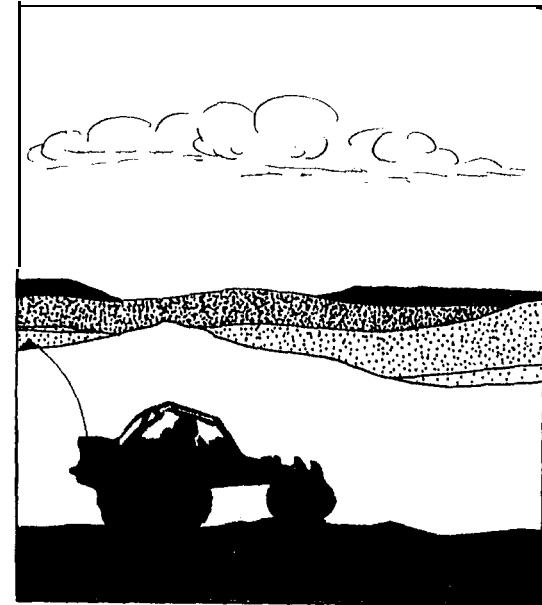
We look forward to receiving the final plan and EIS as soon as it is issued.

Very truly yours,

*Joell T. Turner /jmt*  
Joell T. Turner

JTT:gg

CC: Mr. Harry E. Turner



WRITTEN COMMENTS AND RESPONSES

27

April 24, 1988

After reading the final RMP and EIS statement, I believe the only real and viable alternatives are B and C.

Although C does not seem to be the most manageable of the two, it does conserve the most land. I believe that aspect to be of primary importance not only for species preservation but for the enjoyment of future generations of mankind. Once developed the land is almost impossible to restore to its natural state.

Concerning public recreation areas that are, ~~for~~ would be intensively used around Tortolita Park, Saginaw Hill, Tucson Mountain Park, Picacho and Zion Reservoirs; why not sell the land to county and local governments at below appraisal value? These areas will be very important and accessible to our metropolitan population and could be sold at say, on average, per acre of land evaluation in the state BLM area.

Public land, public money for public use.

I also want to thank you in the BLM for the effort you have made in resolving the land use issues in Arizona.

Sincerely,  
Christy Walton

27-1.

Saginaw Hill, Tucson Mountain Park Extension and Picacho and Zion reservoirs have been proposed for transfer to local governments under provisions of the federal Recreation and Public Purposes Act (R&PPA). The Tortolita Mountains parcels would be retained in public ownership but managed for recreation purposes under a Cooperative Recreation Management Agreement with Pima County.

27-1



28

3095 Jenny Drive  
Prescott Ar. 86301  
April 23, 1988

Bureau of Land Management  
2015 West Deer Valley  
Phoenix Arizona 85027

Attn: Don Ducote  
Land Use Planner

Subject: Phoenix Resource  
Management Plan and Environmental  
Impact Statement: Draft Dec. 1987

I have read with interest the above draft statement. I am particularly pleased that you intend to conserve the areas in the designated Black Canyon and Lake Pleasant Resource Conservation Areas. I urge you to make the following additions to these areas

- (1) Extend the Lake Pleasant Resource Conservation area eastward to the west boundary of I-17.

This addition would provide an attractive vista for travelers on I-17 and preserve an important part of the desert ecology.

28-1

- (2) Extend the Black Canyon Area area southward along I-17 to the north side of the Dry Track interchange. This would prevent development in that small area. There is adequate private land south of the interchange.

Thank you

Robert M. Sullivan

28-1. Refer to response 25-Z.



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
ECOLOGICAL SERVICES  
3616 W. Thomas, Suite 6  
Phoenix, Arizona 85019  
April 28, 1988

Memorandum

To: Phoenix Resource Area **Manager**, Bureau of Land **Management**, Phoenix, Arizona

From: Field Supervisor

Subject: Draft Phoenix **Resource Area Management Plan (RMP)** and Environmental Impact Statement (**EIS**) - Comments

The Fish and Wildlife Service (Service) appreciates the **opportunity** to review the **RMP** and **EIS** for the Phoenix **Resource Area**, Bureau of Land **Management (BLM)** and **has** the following comments.

GENERAL COMMENTS

29-1

The Service recognizes that **RMPs** guide **future** management actions and are not designed to provide detailed information regarding specific actions. However, the general nature of the information provided in this document **maker** the impacts of this major federal action difficult to assess. Specifically, State-BLB **land trades are occurring and** information such as land ownership is not provided for review use.

29-2

The 1986 **BLM Manual (see 1622.11A)** requires that management areas, objectives and directions **be** defined in the **RMP**. The Phoenix **RMP** defines only some priority species and habitats but does not state **management** objectives or prescriptions for any species or habitat. Analyzing the impact of this **RMP** on these **species** or habitats is not possible **without** management prescriptions. To fulfill its function **as** a guidance document and to provide adequate opportunity for public comment, the Service believes that this **RMP** should clearly **state and** prioritize management objectives and prescriptions, particularly for riparian areas, threatened and endangered species, federally **proposed species**, and **other** important fish and wildlife.

29-3

Ye believe that this **RMP does not** fulfill the responsibility **of** the **BLM** under Section 1 of the Endangered Species Act to consult **with** the Service on actions that may beneficially or adversely affect threatened or endangered species. **Because** some decisions **regarding** alternatives in this document may affect federally listed **species (page 8)**, the **BLM** is required to assess the impacts of the action and submit the assessment to the **Service** for consultation. **For** example, because existing ecological conditions are expected to change after special management areas are designated (page 7), the **BLM** should consult with the Service **on** decisions regarding boundary designations in areas containing threatened **or** **endangered** species.

29-1.

As stated on page 20 and illustrated in Figure 2-1, p. 21 of the draft **RMP/EIS**, when land is identified in an exchange package, a series of steps are taken before the actual exchange takes place. These include a site-specific environmental assessment and a published Notice of **Realty Action (NORA)** which are available for public review and comment.

29-2.

**The** indication that only some priority species were considered in the draft **RMP/EIS** is incorrect. Appendix 8 of the draft lists the species which were considered for priority treatment and the Environmental Issues section of Chapter 1 provides the rationale for giving priority status only to species significantly affected by proposals in any of the alternatives chosen for study.

29-3.

Refer to the General Response to Comments on Section 7 consultation.

- 29-3 Consultation is also required prior to disposal of land containing any federally listed species. Additionally, the BLN is required to confer with the Service regarding federal land exchanges which involve proposed species for federal listing. The BLM needs to consult with the Service if the BLN decides to dispose of Silver Creek, which contains Little Colorado River spinedace (Lepidomeda vittata) and in the Tucson Mountain Park Extension, which contains Tumamoc globeberry (Tumamoca macdougalii). Information presented in this document is not sufficient for the Service to determine if listed or proposed species may be affected by the alternative.
- 29-4 The Service requests that the Bureau of Land Management develop a table or short narrative to summarize compliance with the Endangered Species Act, Executive Orders 11988 and 11990, Fish and Wildlife 2000, and Riparian Area Management Policy.
- 29-5 BLM Riparian policy. Fish and Wildlife 2000 and Executive Order 11988 and 11990 need to be evaluated in reference to continued land retention in federal ownership and those areas where exceptions for disposal are in the public interest. The Service believes that these policies should be adhered to in land exchanges and boundary designations of Areas of Critical Environmental Concern (ACEC) and Resource Conservation Areas (RCA).
- 29-6 For Alternatives B and C, management of motorized vehicular travel should be limited to designated roads and trails in those areas with good desert tortoise (Gopherus agassizii) densities. Dirt roads dissect tortoise habitat and result in decreased tortoise numbers within one mile of the new road. In the desert, one cross country route taken by a vehicle can result in a two-track road or trail. Once this happens this route becomes an existing road.
- 29-7 Communication Sites at White Tanks and Newman Peak should be dropped or permitted with the restriction that no new roads or improvements to existing roads will be allowed. These two areas contain significant tortoise habitat either at or within the foothills to these • itea. Allowing additional development, such as communication sites, would result in the same negative impacts associated with new or improved road construction.
- 29-8 Please note that the Little Colorado River spinedace has been listed as threatened (52 FR 35034). References to its proposed status on pages 8, 115, 135, 146, 155, 161, and 190 should be changed.
- 29-9 The White Canyon RCA contains a candidate category 1 endangered plant. We support the commitment of BLM to consolidate land in this area. We prefer the boundary designation of Alternative B, which encompasses more known and potential habitat of this plant than Alternative C.
- 29-4. The section on Management Guidance Common to All Alternatives in the draft RMP/EIS and the General Management Guidance Section in this document address compliance with the provision8 of the Endangered Species Act, including consultation with the Fish and Wildlife Service.
- Refer also to the General Response to Comments in this document.
- 29-5. All applicable laws, executive orders, regulations and directives are considered when evaluating whether BLM land exchanges are in the public interest.
- Refer also to the General Response to Comments on Management Guidance.
- 29-6. Monitoring of tortoise populations would identify impacts to desert tortoises caused by vehicular travel. Appropriate measures would be taken to protect tortoise in impacted areas. The measures may include designating or closing roads.
- 29-7. No new roads are anticipated to service the White Tank Mountains communication site. There are presently no roads servicing the Newman Peak site and none would be allowed under the proposed RMP. See Table 2-4 in this document under management actions for Picacho Mountains Desert Tortoise Management Area. The road closure proposals in the draft's preferred alternative for the Picacho Mountains Tortoise Management Area have been adopted in the Proposed RMP.
- 29-a. The proposed RMP and final EIS acknowledges the recent federal listing of the Little Colorado spinedace as threatened.
- 29-9. Refer to response 22-1.

- 29-10 The Service strongly supports the designation of the Appleton-Ihittal, Baboquivari Mountains, White Canyon, Perry Mesa, Larry Canyon, Tanner Bill, and Waterman Mountains ACECs. In regard to the Waterman Mountains and Tanner Wash ACECs, we support the boundary designations given in Alternative C, because this alternative includes more known and potential habitat than Alternative B. The Service encourages the efforts of BLM to acquire State lands within the Waterman Mountains ACEC (T12S, R9E, Section 32), because this area contains an endangered plant species. We request that the Perry Mesa and Larry Canyon ACEC be expanded to include T10W, R3E, (SE 1/4 of Section 9), Sections 10, 11, and 12. In these sections, Silver Creek has a well developed cienega bordered by deciduous broadleaf forest. Protecting this riparian area would be in consonance with BLM Riparian Policy and Executive Orders 11988 and 11990.
- 29-11 The Service supports the designation of the Black Canyon RCA but requests a modification of the proposed boundary. This RCA should include T11N, R2E, Section 22, E1/2, and Section 27, E1/2, and Section 34, E1/2. The creek in these sections has above-ground water and a well developed riparian area.
- 29-12 The Service requests that BLM consider acquisition of two sections of land near the Tanner Wash ACEC. The sections (T18N, R21E, Sections 11 and 15) contain a candidate category 1 endangered plant and could be managed as part of the Tanner Wash ACEC.

**SPECIFIC COMMENTS**

- 29-13 Page 28, Table 2-4: The Silverbell Desert Bighorn Sheep Management Area should also be designated as a desert tortoise management area. Management goals should include improving habitat conditions for and populations of desert tortoises. Planned actions should limit motorized vehicles to designated roads and trails. Motorized vehicle access should be closed in those areas with good tortoise numbers (50 per square mile). Planned actions should include determining the status of the desert tortoise population in this area and developing an appropriate management plan.
- 29-14 Page 28, Table 2-4: The Service strongly supports designation of the Picacho Mountains Desert Tortoise Management Area. However, we recommend that the management goals be changed to improve existing desert tortoise populations. This management would require routine monitoring of this population for "status and trend." Planned actions are excellent and should be carried through as a priority. Please note that this area is probably too small to protect a viable population as most of the tortoise habitat is on State lands. We recommend that BLM pursue acquisition of adjacent habitat with the State of Arizona.
- 29-15 Page 31, Issue 5 - Recreation Management: When preparing the activity plan for the Halls Canyon Recreation Management Area, BLM should develop the plan to minimize or avoid impacts to the desert tortoise and Arizona skink

- 29-10. Refer to response 22-4.
- 29-11. These areas are within the proposed boundaries of the Black Canyon Resource Conservation Area (RCA) as identified in Alternatives B and C of the draft RMP/EIS and are included within the boundaries of the RCA in the proposed RMP.
- 29-12. Only private land within the identified Resource Conservation Areas is identified for possible acquisition by exchange in the proposed RMP. Any private exchanges would be considered if the proposal is initiated by the private landowners.
- 29-13. Refer to responses 18-6 and 29-6.
- 29-14. Refer to response 18-7.
- 29-15. All relevant environmental issues will be considered when developing activity plans for specific areas.

- (*Eumeces gilberti arizonensis*). Motorized vehicles should be limited to designated roads and trails.
- 29-15 The Tortolita and Sawtooth Mountains have been identified as important areas for intensive recreation uses. Both areas provide habitat for tortoises, possibly in high numbers. In planning and managing these Cooperative Recreation Management Areas (CRMA), the population status of the tortoise should be determined first, and then followed by development of recreation management plans that limit or avoid adverse impacts to the tortoise and its habitat. Some of the area within the Lake Pleasant CRM also contains suitable habitat for the desert tortoise.
- 29-16 Page 116, Map 3-4A: Desert tortoise habitat is not shown on this map
- 29-17 Page 147, Desert Tortoise: General figures on habitat acquisition and disposal for the desert tortoise are presented, but information is lacking on where these parcels are located, whether they are adjacent to existing tortoise habitat on BLM land, and whether the acquired and disposed of lands would result in blocking up tortoise habitat for effective management or scattering habitat ownership. The latter should be avoided to maximize the protection of the tortoise. Also, the impacts associated with land ownership patterns to the desert tortoise should be addressed in this RIP.
- 29-18 This section states that Silver Bell Mountains and Donnelly Nash-Grayback area would be managed to maintain habitat capability for the desert tortoise. This management goal should be identified on pages 28-29 under the appropriate Special Management Areas (SMA) and activity plans should be developed to enhance desert tortoise habitat. This described benefit to the desert tortoise is not indicated in the management goals for these two SMAs.
- 29-19 The designation of the communication sites in the Picacho Mountains could impact desert tortoise populations if access to these sites is provided by constructing new roads or improving existing roads. These roadways will pass through tortoise habitat at the lower elevations.
- 29-20 The conclusions presented on the effects of Alternative B seem unclear and are not substantiated by the information provided. For example, information is lacking on the status of the desert tortoise on lands identified for disposal and for acquisition. Therefore, BLM may not be able to conclude the extent of impacts to this species. We request that BLM provide this information and or, if this is not possible, include a worst case analysis. We believe that the RMP draft EIS does not analyze mitigation measures in sufficient detail to determine the effectiveness of each of these measures for the desert tortoise.
- 29-16. The desert tortoise distribution map in the draft RMP/EIS indicates only known important habitat in the resource area, as stated on page 117 of the draft. The Tortolita Mountains important habitat was inadvertently left off the map, but was included in the discussion of important desert tortoise areas.
- 29-17. Where appropriate, the desert tortoise is considered in every environmental assessment completed prior to all land exchanges.  
Refer also to response 29-1.
- 29-18. Activity plans developed for areas within desert tortoise habitat would consider the affect the actions would have on the capability of the habitat to support tortoises.
- 29-19. Refer to responses 29-6 and 29-7.
- 29-20. The information on page 147 of the draft RMP/EIS provides the status of known important tortoise habitat on land identified for disposal and acquisition.  
Refer also to comments 29-1 and 29-17.

Page 155, Desert Tortoise: Our **comments** on this section are the **same** as those **mentioned** above referring to page 147. Data need to be **presented** that document the overall numbers of tortoises on BLW land in the Picacho **Mountains** and to substantiate **the** overall long **term** stability of this species in the Picacho **Mountains**.

Again the conclusion presented on **maintaining** the viability of the Picacho **Mountain** and other populations **in** the **RMP** area is unsubstantiated based on the information presented in this **RMP** draft EIS. Please provide adequate **information** to support this conclusion or present a **worst** case analysis in the **RMP** draft **EIS**.

29-21

Page 163, Mitigating **Measures**: The Service does not concur with this approach of deferring the development of mitigation **measures** until specific projects are developed. Generally, **when** specific projects are developed by **BLM** and an environmental assessment prepared, these **environmental** documents are generated and approved in-house with little or no review by the Service. Also, development of mitigation measures **on** a project by project basis may fail to consider the cumulative impacts of such actions.

29-21. Refer to the General Response to comments.

29-22

Page 190, Appendix B: **The** jaguar and ocelot should be considered throughout the **RMP** draft EIS analysis and recovery plan goals/objectives should be included where appropriate for **BLM** to perform. **Historic** habitat is located near the Baboquivari Mountains. Recent **sightings** of jaguars have been **made** in this area.

29-22. **The BLM's** Phoenix District has no information indicating that public land in the Phoenix Resource Area is used or occupied by jaguars or ocelots.

29-23

Page 198, Appendix 12: This **document** lacks a Resource Monitoring and Evaluation Plan for Alternative C.

29-23. All the areas and values which would be monitored under Alternative C in the draft **RMP/EIS** are included in the monitoring schedule listed for Alternative B.

Page **198**, Appendix 12, Desert Tortoise: The Service **recommends** that that this section include a definition of crucial habitat including criteria to be used in **making** this determination, and criteria used to **determine** a "significant decrease of habitat capability" and "significant population changes." Be also request that the information obtained **from** line **transects** on relative densities and habitat condition monitoring be provided to this office **as soon as** it is available. The Service **would** like to offer our assistance in **implementing** these **monitoring measures**.

#### SUMMARY COMMENTS

The Service supports preferred Alternative B with our **suggested** modifications. Ye believe that Alternative B **with these modifications** maximizes **resource** benefits to threatened and endangered species, desert tortoise concerns, and riparian fish and wildlife resources. The **Service** would like to **assist BLM** in the development of the above-listed **management** plans that affect candidate, proposed, and listed species.

Again, the Service appreciates the opportunity to review and provide comments on the subject draft **RMP** and **EIS**. If we can be of further assistance, please contact Mr. **Sue Rutman** or se (Telephone: **602/261-4720**).

*Sam F. Spiller*  
Sam F. Spiller

30  
ASARCO

RAY UNIT

RICHARD W. BANGHART  
GENERAL MANAGER  
OWEN D. MILLER  
CONTROLLER

April 27, 1988

Mr. Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Dear Valley Road  
Phoenix, AZ 85027

Dear Mr. Tower:

ASARCO Incorporated's Ray Unit submits the following comments on the Bureau of Land Management's Draft Environmental Impact Statement for the Phoenix Resource Management Plan.

Our comments specifically address the White Canyon Resource Conservation Area which contains ASARCO's Ray Mine and the Copper Butte and Buckeye properties. The Ray Mine employs 480 people and produced 107,700 tons of copper in 1987, valued at \$128,600,000.

ASARCO Ray Unit supports Alternative A. (no action) for the White Canyon Area. We oppose the BLM's preferred Alternative B for the following reasons:

The proposed White Canyon Resource Conservation Area contains known mineral deposits which are important to the economy of Pinal County and Arizona. In addition to the millions of dollars we paid in wages, sales taxes and metal values taxes in 1987, we paid \$1,699,000 to Pinal county for property tax. We note on page 93 that the BLM paid \$386,068 to Pinal County in lieu of taxes in 1986. ASARCO's tax dollars are real in contrast to in-lieu payments which are tax dollars to begin with.

- 30-1
2. Besides the Ray deposit, ASARCO has delineated copper deposits at Copper Buttes (22,000,000 tons averaging 1.09 % copper) and Buckeye (20,000,000 tons averaging .65 % copper). The proposed White Canyon ACEC (page 62) under both alternatives B and C would restrict exploration for, and development of, the area's copper resources. Closing the road in Sections 23 and 24, Township 3 South, Range 12 East would deny ASARCO access to its mining claims. This road is the only maintainable route to the mineral rich area north of the Gila River between Riverside and Cochran.

- 30-1. The establishment of White Canyon ACEC would have little impact on ASARCO mining operations in the area or within the ACEC. No prescriptions are proposed closing the area to mineral entry. Under the mining law, the BLM cannot deny access to ASARCO's mining claims or prevent ongoing exploration and development programs. Necessary access routes would be constructed to minimize or avoid impacts to White Canyon's riparian, wildlife and scenic resources.

30

Mr. Arthur E. Tower

-2-

April 27, 1988

3. The Federal Government has title to less than half (46.9%) of the total 330,770 acres in the proposed White Canyon Resource Conservation Area (page 23). Private interests and the state own 53.1X of the area. Federal, state, and private lands are intermingled which is not conducive to a single interest area management concept such as Alternative B. This point is best made by referring to the Phoenix District land status map where we note that the largest contiguous block of BLM land in the 516 square mile resource area is the 24-square mile parcel in the extreme southwest corner.
4. Also, referring to this same map, the BLM failed to show 34 square miles of Bureau of Reclamation withdrawals which bisect the area from Ashurst-Hayden Dam to Riverside along the Gila River. These withdrawals are associated with the proposed Buttes Dam and include the Middle Gila River Project (AR017239), the San Carlos Indian Irrigation Project (PL0141), Power site (CL438), the Buttes Dam and Reservoir site (PL05316) and reclamation application (A6264). Prior to building Buttes Dam, the railroad would have to be relocated as would private landowners that live in the path of the proposed lake. These withdrawals are included in two proposed Special Management Areas (SMA's) designated as the Middle Gila River Cultural Resources Management Area and the Gila River Riparian Management Area. On page 27, the BLM admits that implementation of these SMA's could only be done with the cooperation of the agency that manages the withdrawals. In other words, the BLM does not now have management authority over these lands which again supports our comment (No. 3) above.
5. Lastly, the Alternative C boundary of the White Canyon Management Area would be enlarged by the addition of 64 square miles of land under Alternative B (p. 51). This proposal makes little sense to us as less than two square miles of this land is BLM land; the remaining 62 square miles is state and private land.

In summary, ASARCO feels that Alternative B is an unworkable management plan for the proposed White Canyon Resource Conservation Area and asks that Alternative A (multiple use) be adopted for this important mineral rich area.

Sincerely,



N. A. Gambell  
Technical Services  
Administrator



Pima County Open Space Committee  
c/o Whittell Trust  
300 E. University, #221  
Tucson, AZ 85705

28 April 1988

Arthur E. Tower  
Phoenix Resource Area  
Bureau of Land Management  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

RE: Comments on the Phoenix Resource Area Draft RMP/EIS

Dear Mr. Tower:

The Pima County Open Space Committee is in the final stages of preparing a long-term open space plan for eastern Pima County. Many of the open space protection ideas formulated by the committee rely on the continued open space character of Bureau of Land Management property in Pima County.

The proposed Baboquivari and Silverbell Resource Conservation Areas are important to Pima County's long-term open space needs. The Tortolita Mountains Cooperative Recreation Management Area is also important as is the lease to Pima County of the BLM parcels in the Tucson Mountains adjacent to and near Tucson Mountain Park and Saguaro National Monument.

The continued protection of the open space character of BLM parcels within the outlying mountain ranges of Pima County such as the Las Guijas and Sierrita Mountains is needed to meet the future open space/recreation needs of an increasing population in these outlying areas twenty or thirty years from now. A BLM exchange for State lands in the Cerro Colorado Mountains to establish a core area of federal control would be very useful for these same reasons. Clearly, having these sites remain in Bureau of Land Management ownership versus State or private ownership greatly enhances their permanent open space quality, whether for recreation use, aesthetic values, etc.

Recognizing that BLM has a limited amount of trade land available to structure the RCA's outlined in your plan, portions of the boundary of the Silverbell RCA could be set back to ensure that the relatively small acreages of other core mountain areas are retained in or transferred to BLM ownership. This is a small trade-off now for what would be of considerable value in later years when open space/recreational needs in the vicinity of areas such as the Sierrita and Las Guijas Mountains are dealt with in final detail. The crucial role BLM has played in the formation of Tucson Mountain Park and Tortolita County Park will be just as essential in these outlying areas some day. Thank you for considering these comments.

Sincerely yours,



William G. Roe, Chairman  
Pima County Open Space Committee

31-1.

The BLM's long-term management goals are to consolidate public land ownership in the Baboquivari and Silver Bell Resource Conservation Areas. Land identified as possessing important resource values (wildlife, plant, riparian, recreation or scenic) would have a high acquisition priority. Such land is near the core mountainous areas named in the comment.

32



# SIERRA CLUB

## Brand Canyon Chapter . Arizona

PAJO VERDE GROUP  
7102 E. Oak St. #8  
Scottsdale, Arizona 85257  
April 27, 1988

Mr. Arthur Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 W. Deer Valley Rd.  
Phoenix, Arizona 85027

Dear Mr. Tower:

The Palo Verde Group Conservation Committee has reviewed the draft Resource Management Plan and EIS for the Phoenix Resource Area. We would like to submit these brief comments for the public record.

We are generally in agreement with the BLM's goals and proposed actions as expressed in this document. The blocking up of BLM holdings within selected areas of high scenic, recreational, biotic, and cultural values is an especially wise move which will have a beneficial effect on public land management for many years to come. The creation of several Areas of Critical Environmental Concern (ACEC's) is also to be applauded, indicating that the BLM is ready to not merely manage but to aggressively defend the unique and sensitive places under its care.

In general, we prefer Alternative C to the preferred alternative B because it places larger areas within the various protective categories. The Perry Mesa and White Canyon ACEC's are significantly expanded under Alternative C, as are the Baboquivari, Silver Bell, and Tanner Wash Resource Conservation Areas (RCA's). But we cannot support Alt. C in its entirety because it also reduces the size of the White Canyon RCA and designates an additional utility corridor right through the sensitive archeological zones on Perry Mesa. We oppose both moves, and find it regrettable that Alt. C mixes proposals to enhance protection of the environment with other proposals that tend to undermine it. We are also concerned about the change in status for the Picacho Mountains under Alt. C, from an RCA to a CRMA (Cooperative Recreation Management Area). We believe that management for the Picachos should benefit desert tortoise populations and maintain the existing wilderness values. Intensive recreational use or development should not occur if it will interfere with those primary goals.

We strongly support the proposed restriction of ORV use throughout the Resource Area to existing roads and trails, and we encourage you to develop educational and enforcement programs which will help transform this proposal to an effective reality.

32-1. The proposed RMP recommends that the utility corridor in the Black Canyon area should follow the draft **RMP/EIS** Alternative B placement, primarily to reduce visual impacts caused by new development.

The status of the Picacho Mountains in the proposed RMP would be as described in Alternative B of the draft **RMP/EIS** except that additional state land would be identified for acquisition and, upon acquisition, become part of the RCA and desert tortoise management area.

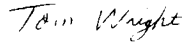
We also support Recreation Management Area designations for Hell's Canyon and the Coyote Mountains pending any Congressional action on a BLM wilderness bill. These are both important scenic and recreational areas close to major metropolitan zones, and special management focusing on those values is entirely appropriate.

32.

White Canyon is an area of special interest to many of our members. While we were happy to see the proposed ACEC status under the preferred **alternative**, the boundaries and size of the proposed unit are entirely inadequate. The expanded unit under Alternative C is preferable in every way and has our enthusiastic support. We also urge you to recognize that there is an equal (possibly greater) amount of acreage in the Tonto National Forest, immediately north of the BLM holdings, which also contains important riparian habitat, cultural resources, and wilderness characteristics in upper White Canyon and in adjacent Wood Canyon. The BLM/National Forest boundary cuts arbitrarily through the center of this splendid natural area. We believe that a cooperative management approach is called for, with both agencies aware of the extent and quality of the area's resources and working together to protect them.

Thank you for this opportunity to comment on the draft RMP/EIS

Sincerely,



Tom Wright, Conservation Chairman  
Palo Verde Group  
Sierra Club

32-2.

**The proposed RMP recommends adoption of the draft's preferred alternative (Alternative B) boundaries for the White Canyon ACEC as the most feasible ACEC management unit considering other multiple uses of the area. The BLM would cooperate fully with the Forest Service when developing an activity plan for the area.**

33



## United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

450 GOLDEN GATE AVENUE, BOX 606,  
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

DES 88/0002

L7617(WR-RP)

April 19, 1988

## Memorandum

To: Manager, Phoenix Resource Area, Bureau of Land  
ManagementFrom: **ACTING** Regional Director, Western RegionSubject: Review Comments on the Draft Phoenix Resource  
Management Plan and Environmental Impact Statement,  
Phoenix, Arizona (DES 88/0002)

We have completed our review of the Bureau of Land Management's Draft Phoenix Resource Management Plan/Environmental Impact Statement and have the following comments.

33-

1. The boundaries shown for Saguaro National Monument need adjustment on the BLM's South Central Portion Map. Inaccuracies remain despite discussions in 1986 with BLM staff to make changes. Maps are enclosed to show the necessary changes for both districts. For Tucson Mountain Unit, the National Park Service landownership and administrative boundary are larger than indicated by BLM. At the Rincon Mountain Unit, the U.S. Forest Service boundary shown within the Monument does not exist now.

We are also including a map to show the correct boundary for Coronado National Memorial. Although the Memorial is not directly affected by the Phoenix Resource Management Plan, this information will help the BLM correct Coronado's boundary on its South Central Portion Map.

33-2

2. There are two parcels of BLM land next to the Tucson Mountain Unit, Saguaro National Monument, that interest us. The BLM has designated these scattered parcels for disposal possibly through exchange. Either State or private ownership could result in uses that might be detrimental to the Monument's resources. One parcel (T. 13 S., R. 11 E., NE 1/4, Sec. 29) contains and endangered plant, the Tumamoc globeberry, and the second parcel (T. 13 S., R. 12 E., SE 1/4, Sec 9) is an area of local controversy about mineral entry.

33-1. The South Central Portion map reflects our understanding of the National Park Service (NPS) boundaries of land under NPS ownership in 1986. The NPS map shows the park boundary limits established by Congress, within which the NPS would attempt to acquire any non-public land.

The U.S. Forest Service boundaries shown within the Rincon Mountain unit and the incorrect Coronado National Memorial boundary are errors reflected in the base map used to develop the three BLM maps.

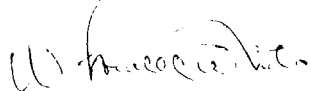
Maps printed in the future will reflect the NPS-suggested changes for all three areas,

33-2

We would like to have these two parcels transferred to the National Park Service, an action that is endorsed by environmental groups. In the past, BLM has generously transferred some adjacent parcels to Saguaro National Monument. Your consideration of another transaction would be appreciated.

In summary, we commend the Bureau of Land Management's efforts to consolidate landownership and create Resource Conservation Areas, which will allow the agency to have more manageable units. If you have any questions about these comments, please contact Jim Laney, General Superintendent, Southern Arizona Group, at FTS 261-4959.

Sincerely,



for Stanley T. Albright  
Regional Director, Western Region

Enclosures 3

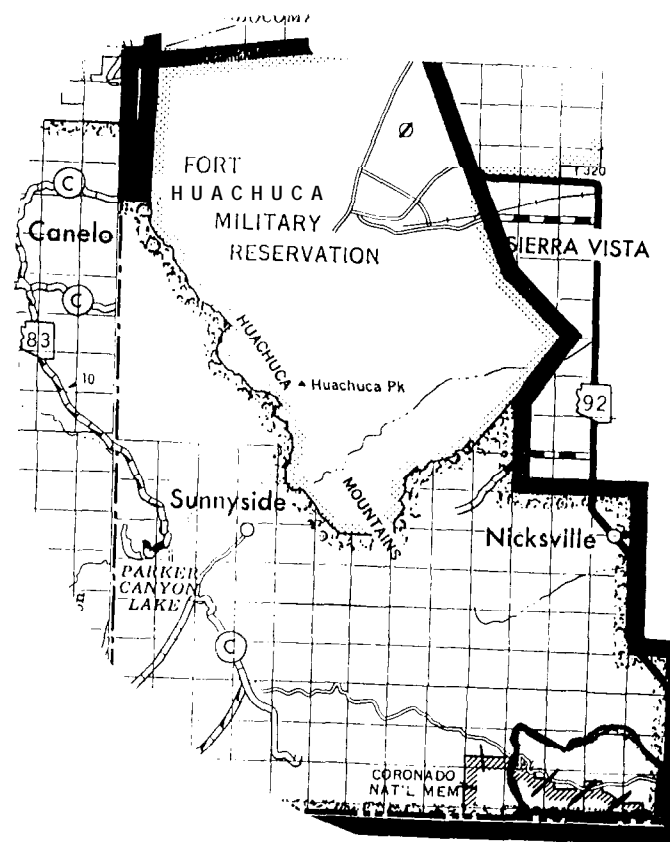
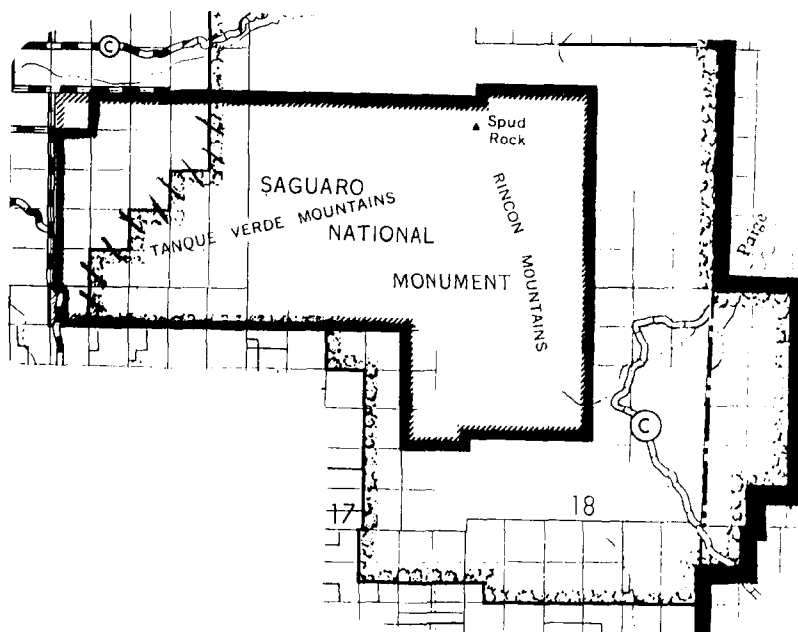
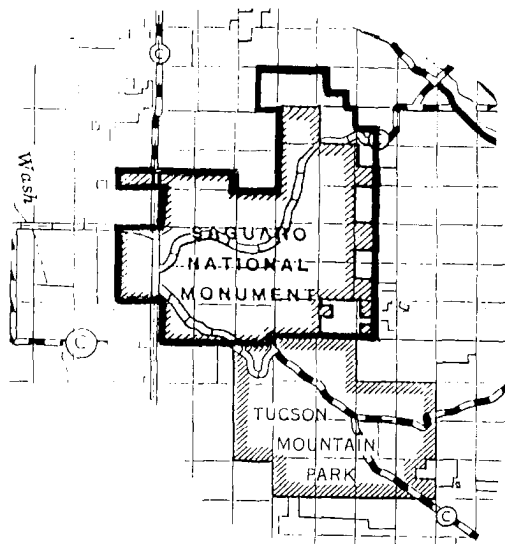
33-2.

In the proposed RMP these parcels have been identified for retention in public ownership pending Congressional action to expand the monument's boundaries.



Blue Grama

33



ROSE MOFFORD, Governor

34

COMMISSIONERS  
LARRY D. ADAMS, Bullhead City, Chairman  
FRANCES W. WERNER, Tucson  
THOMAS G. WOODS, JR., Phoenix  
PHILLIP W. ASHCROFT, Flag  
GORDON K. WHITING, Kingdome

DIRECTOR  
TEMPLE A. REYNOLDS

Deputy Director  
DUANE L. SHROUFE



ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

April 29, 1988

Mr. Arthur E. Tower  
Area Manager  
Phoenix Resource Area  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

The Arizona Game and Fish Department has reviewed the draft Phoenix Resource Management Plan (RMP) and Environmental Impact Statement (EIS), and we respectfully provide the following comments.

34

The RMP document, as we understand, replaces the three Management Framework Plans (MFPs) which preceded this process. We also note that the RMP is intended to meet the requirements of the Federal Land Policy and Management Act (FLPMA). It is the Department's belief that the document lacks enough detail to meet FLPMA guidelines for wildlife resources. The previous MFPs contained specific standards and guidelines to attain wildlife resource objectives. The current RMP document is completely lacking in similar content.

34

We believe a primary issue relative to this draft RMP is Land Tenure Adjustment. The alternatives considered within the RMP do not present any options for this issue. Therefore, we believe the four alternatives considered do not meet National Environmental Policy Act (NEPA) requirements. Though alternatives A and D provide extreme baseline comparisons (no action and total disposal alternatives), alternatives B and C reflect little substantive difference in land management decisions. The consequences of addressing planning issues (i.e. land tenure adjustments) in dissimilar ways is not addressed, as required under NEPA. Discounting alternatives which retain lands in Apache and Navajo counties, because of potentially complex land trades needed to block up lands (page 41), does not appear justified, when compared to recent BLM land exchanges.

The guidelines for land disposal provided for in FLPMA are cited numerous times throughout the document--tracts difficult and uneconomical to manage. However, with the exception of unpatented mining claims (page 15) there is little mention of

34-I. The RMP does replace older **MFPs**. However, as stated on page 1 of the draft RMP, "**MFP** decisions that still have merit are being carried forward and are incorporated into this RMP."

Refer also to the General Response to comments.

34-2. An option for retaining land in Apache and Navajo Counties and the consequent impact on resolving the land tenure adjustment issue **is** analyzed in Alternative A of the draft **RMP/EIS**. As discussed on page 41 of the draft **RMP/EIS**, **other alternatives which** would create public land blocks in the two counties through **exchanges were also considered**.

WRITTEN COMMENTS AND RESPONSES

those policies relative to retention of lands in public ownership, where endangered species and high natural resource/wildlife values are present. Further, though checkerboard lands may present inefficient land management (page 125), they may still provide effective land management. When significant resource values are present (i.e. Little Colorado River spinedace; paperspined cactus; potential black-footed ferret occurrence/reintroduction sites; high-value pronghorn habitat), even inefficient land management is preferable to no lands in federal management.

- 34- Though blocking up lands in Apache and Navajo counties does not appear feasible, at this time, retaining those checkerboard tracts with the highest resource values, now, may lead to future opportunities. The first sentence on page 164 provides the logic and summary for these arguments, but from the opposite perspective. Changing only one word and adding two defines the issue..."therefore, over the short term, land retention may negatively impact some resource (BLM efficient management) that over the long term other resources (wildlife) would be greatly benefited". We again suggest that the Bureau consider an alternative which would allow for blocking up or consolidating of highest resource value public lands in Navajo and Apache counties.

Further, a prime example of where the Bureau did not consider the true impact of land consolidation favoring State land and private ownership is in the assessment of the Preferred Alternative (B), and others, as it relates to impact on pronghorn habitat. It is stated in several places that BLM administration of pronghorn habitat accounts for only seven percent of the total habitat in the assessment area (pages 117 and 148), and the environmental consequences conclusion for pronghorn states that only "two percent of the total habitat in Apache and Navajo counties would eventually be abandoned as a result of subdivision development" (page 148). This, in our opinion, grossly underestimates the impact of this proposed liquidation of public lands in the area. The Department's Geographic Information System (GIS) records indicate that BLM administration of pronghorn range in the project area (Units 2A, 2B, 2C, 3A, 3B, 4A, 4B, less USFS lands) accounts for 10 percent, State Trust 28.2 percent, and private 56.8 percent. It is greatly feared that the loss of this 10 percent of BLM-administered pronghorn habitat will facilitate the future development in the area, if not short term, then long term. Not only will this 10 percent loss of public pronghorn habitat represent a potential loss of habitat, but far greater than two percent of the total ownership will be potentially lost to future development. As is, the current land ownership patterns serve as somewhat of a deterrent to development and ensure some kind of maintenance of open space.

- 34-3. Impacts to all the resource values mentioned in the comment were analyzed in all alternatives. Refer to Chapter 4 of the draft RMP/EIS.

Alternatives for consolidating public land in Apache and Navajo Counties were considered but not carried forward for the reasons stated on page 41 of the draft RMP/EIS.

- 34-4. The Department's GIS record made available to the BLM shows 100,000 more public acres in the two counties than actually exist. In any case, it was the conclusion of the planning team that only a small portion of the exchanged public land would be developed in the long term and that the vast majority would continue to provide habitat for wildlife, including pronghorn.



Additionally, the lack of recognition of the resource value within Apache and Navajo counties (page 23) is clearly in error. For instance, the draft RMP appears to discount the value of the pronghorn habitat in Apache and Navajo counties which supports low or lower densities, accounting for 93 percent of the habitat (page 117). This habitat, despite low densities, still represents important habitat for pronghorn, even on a statewide scale. It must be emphasized that the density classes represent averages for relatively large acreages, and that considerable pronghorn populations inhabit these areas, though in a non-uniform distribution. The fact that resource values are discounted over much of the RMP area is further illustrated by the statement that "All disposal lies outside the RCAs (Resource Conservation Areas). The land is mostly scattered parcels exhibiting few or low natural resource values" (page 23). It has been the Department's contention that this is not the case, as the lands in Apache and Navajo counties hold considerable value for pronghorn, nongame (e.g. Ferruginous hawk), and T&E species (e.g. paperspine cactus). Yet another example of how the potential resource values of lands here have been discounted is evident on page 11, where it is stated that the "inventory conducted by the BLM and AG&FD has not identified any occupied (black-footed ferret) areas or areas considered to be potential habitat (i.e. the presence of large prairie dog town complexes)." This survey is just now being completed, and numerous large prairie dog town complexes have indeed been located throughout the area. The PA would certainly preclude consideration of future potential habitat designation for black-footed ferret.

Additional comments/information on species of special concern follow:

#### Desert Tortoise

The designation of a Special Management Area for management of desert tortoise and the development of an activity plan is an excellent approach for addressing tortoise issues. However, the Picacho Mountain SMA is too small and does not include important habitat on the adjacent lower mountain slopes and bajada. To insure long-term tortoise populations, BLM should direct its efforts toward the special management of greater acreage. This can be accomplished by seeking acquisition of the state land surrounding the Picacho Mountains and/or by placing special management designation on a larger block of contiguous BLM tortoise habitat. Including the desert tortoise as part of the Silver Bell Bighorn Sheep Management Area would be compatible with the goals for that area.

34-5

34

34-5. It was not the BLM's intent to indicate that low resource values equate to no resource values on land outside the proposed RCAs. No resource value was discounted during the development of the draft RMP/EIS.

The paperspined cactus is not a threatened or endangered species.

The results of the black-footed ferret inventory were not available to the ELM before the draft RMP/EIS was printed. The completed inventory identified 13 prairie dog towns meeting the criteria for potential black-footed ferret use. None of the towns was found to be occupied by ferrets.

34-6. Refer to responses 18-6 and 18-7.

Little Colorado River Spinedace

34-7 Disposing of any properties which provide habitat for a listed threatened species must be carefully scrutinized. The fact that BLM currently administers the only federal lands on Silver Creek increases the priority for maintaining federal presence along the creek. This presence provides the only opportunity to maintain the population that currently exists in Silver Creek. To abandon these properties, based on the supposition that the Silver Creek population will sooner or later be lost anyway (page 1461, is derelict in BLM's responsibilities as imposed under the Endangered Species Act, and by BLM's internal policies. In addition, on the maps provided, public lands are indicated along the Little Colorado River in the vicinity of Woodruff. This is documented spinedace habitat, yet there is no mention of these lands in discussions on this fish.

Paperspined Cactus

34-8 Eliminating this special status species entirely from BLM management, through land tenure adjustments, should not occur. Retaining lands which include shared habitat values for this species with pronghorn is encouraged (i.e. the area between State Routes 77 and 377).

Tanner Wash ACEC

34-9 Expanding the boundaries of the Tanner Wash ACEC in the preferred alternative, to reflect the boundaries in Alternative C, would include additional potential habitat for the endangered Peebles Navajo cactus. Given the rarity and difficulty of accurately surveying for this species, BLM should consider all available options.

Waterman Mountain ACEC

34-10 Potential habitat for Tumamoc globeberry and Thornber fishhook cactus would be included within this ACEC, if the boundaries would reflect that in Alternative C. Documented occurrences of both species are within similar habitat from only a few miles from the expanded ACEC boundary.

34-11 In conclusion, the Department recognizes a major deficiency in the draft RMP/EIS in the land tenure adjustment issue. We recommend that the BLM give further consideration to a alternative for this issue, which addresses the high natural resource/wildlife values present in Navajo and Apache counties, and which can address BLM's objective for pronghorn management "to increase the capability of public land habitat to support pronghorn" and to ensure protection of other valuable resources, such as, the paperspined cactus.

34-7. The public land parcels near Woodruff are not listed by USFWS as being within the habitat area covered under the listing of Little Colorado River spinedace.

Refer also to response 22-3.

34-8. Ongoing research and inventory as well as a USFWS status survey for the species indicate that this cactus has relatively stable, federally protected populations in New Mexico which do not require listing as threatened or endangered. Recent inventory indicates that the paperspined cactus occurs in densities of up to 900 plants per square mile in portions of its habitat in Arizona. The known range of the plant in the RMP area covers approximately 720 square miles in Navajo County. Land use and development patterns in Navajo County would likely remain unchanged over most of this habitat regardless of ownership, with livestock grazing as the predominate use. Exchanges within the cactus' habitat would not be expected to affect the federal listing status of the species.

34-9. In the proposed RMP the boundary of the proposed Tanner Wash ACEC has been revised to include not only all known populations of the Peebles Navajo cactus but also the potential habitat thought necessary for eventual recovery of the species. See map 2-18 in this document.

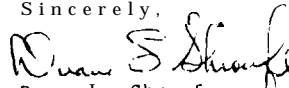
34-10. Potential habitat for Tumamoc globeberry and Thornber fishhook cactus is found throughout the proposed Silver Bell Resource Conservation Area. No additional protection for these species would result by adopting the draft RMP/EIS Alternative C boundaries for the ACEC.

34-11. Refer to response 34-2.

One particular planning methodology proposed in this draft RMP, which is unique to **BLM's current** RMP planning effort, is the resource conservation area (RCA). The Department supports this effort to subdivide RMP areas into **smaller, more** manageable **blocks**, where **specific** resource issues or **resource** values can be emphasized and enhanced in the long **term**.

The Department recognizes the major effort that went into the development of this draft RMP/EIS, and appreciates the opportunities that we have had to review and provide comment. A separate list of comments specific to the draft document is attached.

Sincerely,

  
Duane L. Shroufe  
Deputy Director

Arizona Game and Fish Department  
Specific Comments on Draft **RMP/EIS**

Page 21, Figure 2-1, BLM Land Exchange Process

- 34-12** The RMP fails to discuss the Notices of Realty Action (NORA) currently being processed by Phoenix District.

Page 24, Issue 2, Alternative B

- 34-13** We recommend adding a sentence to specifically prohibit the development of a road to the Newman Peak communications site; access could be by helicopter.

Page 26, Table 2-3

- 34-14** Under the Appleton-Whittell ACEC, the implication of "...prohibit land use actions except as authorized by Research Ranch" suggests the possibility of public access closure, which the Department must oppose.

Page 27

- 34-15** Special Management Areas (SMAs) should include language for cooperative planning and management with the Arizona Game and Fish Department. AGFD should be a cooperator for Coordinated Resource Management Plans (CRMPs), as well.

Pages 28-29, Table 2-4

Coyote Mountains Recreation Management Area. We recommend to specifically add hunting as a recreation value. AGFD should be a cooperator in developing the access plan.

- 34-12.** Routine management practices occurring on a day-to-day basis are not relevant topics for discussion in an **RMP**. **NORAs** are only one part of an administrative action in carrying out decisions made through existing Bureau planning. **AG&FD** receives and has opportunity to comment on all land exchange **NORAs** issued by the Phoenix District.

The role of **NORAs** in the **BLM** land exchange process is illustrated in Figure 2-1 on page 21 of the draft **RMP/EIS**.

- 34-13.** Refer to responses 29-6 and 29-7.

- 34-14.** The **AG&FD** will be consulted if closure of public access to BLM-administered land is contemplated.

- 34-15.** The **AG&FD** has always been an important contributor in the development of **BLM** activity plans. We expect the close cooperation to continue in all areas of mutual interest and responsibility.

Aqua Blanco Ranch Multiple Resource Management Area and Cocoraque Butte-Waterman MRMA. AGFD should be included in development of the access plan. Also, hunting should specifically be included as a valid activity.

Silverbell Desert Bighorn Sheep Management Area. AGFD should be the primary cooperator, and named as such, for development of the activity plan. Also, we recommend including desert tortoise and Harris' hawk as key species in this area.

Picacho Mountains Desert Tortoise Management Area. The Department supports Alternative B for communications site development, also the ACEC designation under Alternative B. We compliment the Bureau for recognizing the high-value riparian and native plant values. However, we are concerned about the implied loss of hunting recreation opportunities on 2,341 acres associated with the Appleton-Whittell ACEC. The Department opposes a hunting closure of these lands.

34-16 We are somewhat puzzled by the vast array of Special Management designations, and what they mean, under Alternative B. The document never explains what is meant by certain terms, such as "...manage to enhance recreation values" and "...manage for conservation values." We are particularly concerned about the absence of any reference to hunting recreation and active cooperation with the Arizona Game and Fish Department.

34-17 We specifically do not understand the desert tortoise emphasis in the Picacho Mountains. The majority of prime desert tortoise habitat in the Picacho Mountains is at elevations below BLM holdings. Conversely, the Silverbell-West Silverbell-Ragged Peak area is high-quality desert tortoise habitat, with a viable population that would benefit from active management efforts.

34-18 We consider it ironic that BLM proposes to "protect" a tortoise population already impacted by construction of the Central Arizona Project (CAP) Canal, and on a mountain with minimal to no livestock grazing of lands under BLM control. The Silverbell Complex, in contrast, would benefit tremendously from management efforts by the BLM. Therefore, we strongly recommend the designation of the Silverbell area as a sheep and tortoise Management Area.

34-19 We also question the closure of any roads in the Picacho Mountains which access existing AGFD catchments.

Page 31, Issue 5 - Recreation Management

34-20 Table 2-4 does not describe the management goals and planned actions in any detail. Again, hunting is never mentioned, nor is the commitment to cooperate with AGFD ever mentioned. We strongly recommend significant expansion of the document to clearly explain the goals and planned actions for all SMAs.

34-16. Hunting is prominently mentioned as an important recreational use in Chapter 3 of the draft RMP/EIS. Recreation values are those discussed in the Recreation Use section of Chapter 3 in the draft RMP/EIS. Conservation values with reference to cultural sites are defined in the Glossary and in Appendix 6 of the draft RMP/EIS.

34-17. See responses 18-2 and 18-7.

34-18. See response 18-6.

34-19. AG&FD access to service catchments is considered a necessary function and would not be affected by public access closures.

34-20. Since hunting is an important recreation use of public land (see Chapter 3 Recreation Use section), the activity is expected to continue. During the development of activity plans detailing the methods for achieving the identified management goals for ACECs and special management areas, the AG&FD would be consulted if any hunting restrictions are discussed. The close-working relationship between the BLM and the AG&FD is expected to continue in all areas of mutual interest.

34-21 We strongly question the conclusions concerning the ability to retain, or increase, BLM holdings in the Sierrita and Las Guijas Mountains. We believe losses of wildlife habitat for desert mule deer and javelina will be significant in the Sierrita and Cerro Colorado Mountains. A significant white-tailed deer population will be sacrificed via exchange of the Las Guijas Mountains.

34-22 Also, acquisition of the Tortolita Mountains, but disposal of the lower bajada holdings and the Suizo Mountains, will result in significant loss of upland Sonoran desert habitat, typified by ironwood (*Olneya tesota*), palo verde (*Cercidium spp.*), mesquite (*Prosopis spp.*), and saguaro (*Carnegiea gigantea*). Associated wildlife include concentrations of Gambel quail, javelina, desert mule deer, desert tortoise, and Harris' hawk. The Arizona Game and Fish Department is becoming increasingly more concerned with BLM disposal of lands which exhibit high quality Sonoran desert values.

The following AGFD wildlife water catchments would be removed from public lands:

- Owl Head Mountain #5 (AGFD #103) NENW Section 1, T8S, R11E
- Owl Head Mountain #9 (AGFD #107) SWSE Section 21, T8S, R12E

34-23 The following catchments have access roads which we require for maintenance:

- Picacho Mountains #2 (AGFD #213) Section 21, T8S, R9E
- Picacho Mountains #4 (AGFD #688) Section 10, T8S, R9E (SW 1/4)
- Picacho Mountains #5 (AGFD #689) SE 1/4 Section 26, T8S, R9E

Page 53, Map 2-9

Horsethief Basin Lake is wrongly labeled "Horseshoe Lake."

Page 73, Map 2-25

34-24 The same comment as for page 53, plus the legend denotes a "Recreation Mgmt. Area" that is nowhere to be found on the map.

Page 118

34-25 What is the criterion for "High Density Javelina Habitat"? The entire area between the Bradshaw Mountains and S.R. 74 to the south and the map boundary to the west is good javelina habitat. Wildlife Management Unit 20B receives considerable use by archery and general season javelina hunters. The depiction on the map is misleading, at best.

Page 120, Javelina

Highest density areas for javelina may not have the greatest need for management emphasis. As mentioned for the map on page 118, javelina hunting is very important outside areas marked as "High Density."

34-21. Only a small fraction of the land in the three areas is public land. Little change in current land use is expected as a result of exchange. Consequently, we do not expect exchange of the public land in these areas to affect wildlife significantly.

34-22. The proposal to exchange public land outside the identified Resource Conservation Area (RCAs) for non-public land within the RCAs would not result in a net loss of the public values mentioned in the comment. In the White Canyon and Silver Bell Mountains RCAs, for instance, the potential exists for the BLM to acquire significantly more of these values than are given up in exchange.

34-23. See response 34-19.

34-24. The recreation management area is the Hells Canyon Recreation Management Area. The area is shown on Map 2-25 in the draft RMP/EIS, although slightly obscured by the shading used to denote the burro management area. The area is more clearly shown on Map 2-25 in this document.

34-25. The map depicts areas where the highest densities of javelina are expected. The reference used was the AG&FD's 1985 Big Game Distribution Map.

- Page 121, Table 3-16
- 34-26 The fishing days for Picacho Reservoir and Lake Pleasant appear woefully inaccurate, as do the hunting days at Picacho. An explanation of how these numbers are derived may clear this up.
- Page 138, Table 4-6
- 34-27 Days for Picacho areas noted above and Pleasant have greatly increased; it's not clear how these numbers have changed, or why.
- Page 148, Effects on Wild, Free-Roaming Burros
- 34-28 Management of burros to increase population levels to halt the population decline is questionable management. Burros are not wildlife, but are feral animals which can cause significant adverse impact to wildlife habitat. There are plenty of areas in the western United States where people can see relic herds without the need to risk overpopulation and abuse of public land.
- Page 149, Table 4-S
- 34-29 Again, the fishing and hunting days for Picacho Reservoir and a tenfold increase in fishing at Pleasant is not clear.
- Page 173, Appendix 1
- 34-30 We note the inclusion of lands in T11N, R3W in the table of land meeting FLPMA Sales criteria, but find no mention of resources or impacts to those resources in the draft REP. Without those, adequate analysis of impacts is impossible.

- 34-26. The figures listed in the draft **RMP/EIS** on page 121, Table 3-16, are visitor use numbers for visits to public land on or near Picacho Reservoir and Lake Pleasant. These figures are not total visitor use figures for fishing or hunting visitor use days either reservoir.
- 34-27. The figures described in the draft **RMP/EIS** on page 138, Table 4-6, indicate increased visitation to public land near Lake Pleasant due to long-term increases in the population of Phoenix and the north valley as well as increased public use of the enlarged and improved Lake Pleasant Regional County Park. The figures describe only visits on or to Public land and do not represent total visitor use at the reservoir. The figures for Picacho Reservoir are unchanged from those presented in Chapter 3, Table 3-16. The described fishing and hunting visits are those attributable only to Public land, not the entire Picacho Reservoir.
- 34-28. Public Law 92-195 makes the BLM responsible for the welfare and protection of unclaimed and unbranded burros found on public land. The management of burros on public land is accomplished at the minimum level necessary to assure the herd's free-roaming character, health and self-sustaining ability.
- 34-29. The figures in the draft **RMP/EIS** on page 149, Table 4-8, describe a situation where there would be no public land near Picacho Reservoir. Accordingly, fishing and hunting days attributed to public land at Picacho Reservoir would be zero. Under Alternative B, much of the land encompassing Lake Pleasant Regional County Park would be public land used by the county under a Cooperative Recreation Management Agreement. Visitor use of this park land would be considered visits to public land; thus visits to public land in the Lake Pleasant Resource Conservation Area would increase under Alternative B. Presently, no fishing activity attributable to use of public land occur on Lake Pleasant. Under Alternative B, a sizable increase in the use of public land for fishing activity would be anticipated due to an increase in public land areas resulting from BLM-state exchanges.
- 34-30. Parcels listed in Appendix 1 of the draft **RMP/EIS** are those that meet the criteria stated in the Federal Land Policy and Management Act (FLPMA) for public land sale. These parcels are identified for disposal and have been evaluated to determine whether they contain values which would preclude disposal, either by exchange or sale. If the **AG&FD** is aware of values on the parcels listed which might affect a disposal decision, the BLM would appreciate receiving this information.



35

# SIERRACLUB

Grand Canyon Chapter . Arizona

RINCON GROUP

April 29, 1988  
117 N. 2nd Avenue  
Tucson, A Z 85705  
792-2690

Arthur E. Tower  
Manager, Phoenix Resource Area  
Bureau of Land Management

Dear Mr. Tower a

Thank you for the opportunity to comment on the draft  
Phoenix Resource Management Plan and Environmental Impact  
Statement.

I must compliment the RMP team for the plan's emphasis  
on special management of the scenic, recreational, biotic,  
and cultural values on public lands. These are important  
resources for both the health of the land and the health of  
Arizona's economy, as the state's population grows and our  
tourism industry expands.

For the most part, we support the plans laid out under  
Alternative C. It gives significantly better protection to  
sensitive plant and animal populations, and by extension, to  
the ecosystems they require. It also does a better job of  
protecting some other values. Especially praiseworthy are  
the Alternative C boundaries of the White Canyon and Perry  
Mesa/Larry Canyon ACECs. We also strongly support the  
proposed R&PPA transfer of BLM lands in the Tortolita  
Mountains.

We would, however, like to see some changes in  
Alternative C:

35-

1. The Waterman Mountains ACEC should encompass the Pan  
Quemado range. The ACEC is apparently meant as a refuge for  
the Tumamoc globeberry, which clearly has habitat extending  
through the Pan Quemado area. More significantly, the Pan  
Quemados may also support a population of Thornber's  
fishhook cactus, and would appear from the ground to be good  
desert tortoise habitat. Thus, a larger ACEC could provide  
protection for all three species.

35-2

2. The Silver Bell Desert Bighorn SMA should also be managed  
for desert tortoise. It contains far more tortoise habitat  
than the Placcho Mountains SMA proposed in Alternative B,  
and with acquisition of state and private holdings between

35-1. The Waterman Mountains ACEC encompasses populations of  
the endangered **Nichol** Turk's head cactus. Habitat for  
Tumamoc globeberry and Thornber fishhook cactus is  
found throughout the proposed Silver Bell RCA. Adding  
Pan Quemado to the ACEC boundary would not add  
significantly to **protection** efforts for any of the  
three species.

35-2. Refer to response 18-6.

WRITTEN COMMENTS AND RESPONSES

the Silver Bells and Ragged Tap. it creates a well-defined and manageable area of prime tortoise habitat. Management should include an end to livestock grazing. as cattle are a principle cause of turtle mortality (as mentioned on p. 117); closure of most existing roads and trails, to prevent tortoise collecting (p.117) and disturbance of bighorn sheep (p.115); and closure to new mining claims, to prevent bighorn disturbance, heavy human use, and construction of new access roads (pp.115 & 117).

3. The Picacho Mountains should be managed as a desert tortoise SMA, as proposed in Alternative B, and not as a CRMA. Recreation-oriented management would have significant damaging effects on the tortoise population (p.155). Management should include an end to livestock grazing, and cooperative management with the State Land Department for the health of the tortoise population on adjacent bajada areas.

4. Alternative C should include the Alternative B proposal of R&PPA transfers to Pima County of Saginaw Hill and Tucson Mountain Park Extension (p.31).

In addition to those particulars, we have some comments on the document as a whole:

35-3 | 5. The Yuma Mine property (T135, R12E, S9) should be closed to new mining claims. Efforts should be made to retire the existing claims, and the land should be transferred through R&PPA to the U.S. Park Service. Similar closure and transfers should be done for public lands in Sections 26, 33, and 34. All these parcels are apparently, and inappropriately, listed for disposal in the RMP (p. 174).

6. The discussion of Minerals Management (p.16) should include a section on closure of land to new mineral entry. True multiple use management must include a willingness to exclude, in some areas, uses which are incompatible with other uses or with existing and desired values.

35-4 | 7. Management plans for values that conflict with grazing, such as riparian habitat or desert tortoise populations, should include explicit discussion of reducing or retiring grazing allotments and/or construction of cattle enclosures.

35-5 | 3. The South Bradshaws and Ragged Top WSAs should be included in the table on p. 184.

35-3. Refer to response 33-2.

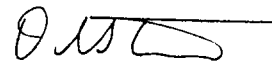
35-4. When the approved RMP is implemented, activity plans will be developed detailing the methods for achieving the identified management goals for ACECs and special management areas. In compliance with NEPA, all appropriate measures will be taken to mitigate impacts to important values in each area.

35-5. The South Bradshaws East and Ragged Top WSAs were studied in the Arizona Mohave Wilderness Draft Environmental Impact Statement, not the Phoenix Wilderness Final EIS.



- 35-6 9. The "Little long-nosed bat" (p. 11 & 190) should be referred to as "Sanborn's long-nosed bat". It should probably also be upgraded to status C-1, as USFWS has officially proposed to determine Endangered status for It (Federal Register, July 6, 1967, pp. 25271-25274).
- 35-7 10. A blanket policy of full fire suppression (p. 19) is not appropriate. Wildfires should be allowed to burn when not a human hazard, as they can contribute significantly to natural ecological processes. In particular, they can benefit wildlife by enhancing the forage available.
- 35 8 11. Restricting vehicles within SMAs to "existing roads and trails" (pp. 28-30, 37-39) is not an adequate prescription. Past off-road vehicle use has, in many places, created unneeded and inappropriate trails that would be "grandfathered" in under that directive. In addition, few areas have had detailed inventories done on their roads and trails, so there is no standard of "existing" with which to determine that a road or trail is new. The only workable management tool to limit undesirable vehicle use is to close all roads and trails unless they are signed open (Off-Road Vehicles on Public Land, Council on Environmental Quality. 1979: "Impacts and Management of Off-Road Vehicles", USGS, 1977). This was considered and rejected for the Phoenix District as a whole (p. 42), an appropriate measure given the scattered and diverse nature of the lands involved. It absolutely should be implemented, however, on SMAs and ACECs, as they are well-defined and manageable parcels with identified values in need of protection.
12. Tables describing the ACECs and SMAs should also list the grazing allotments associated with those areas. This would allow cross-reference to Appendices 2, 3, and 4 (pp. 175-184) and to other documents on range condition and management.

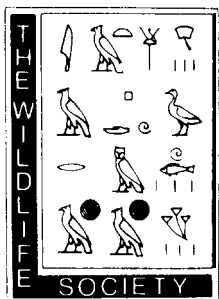
Yours,



Dale S. Turner  
Conservation Chair  
Rincon Group

- 35-6. The Sanborn's long-nosed bat has been removed from the Phoenix Resource Area's special status list. The species is not known to inhabit areas under our administration.
- 35-7. Activity plane developed for ACECs and special management areas would identify areas where less than full suppression of fires or prescribed burning would be beneficial in achieving the management goals described for the areas.
- 35-g. Site-specific activity planning will evaluate ORV signing needs necessary to achieve ORV management goals. The use of ORV signing would be restricted to marking major entry points administered by the BLM and other specific areas (ACECs, special management areas). In high visibility and use areas, signing may be needed to acquaint users with ORV designations and describe where visitors can obtain additional information. Intensive signing is anticipated only in areas with identified management concerns (ACECs and special management areas). Signing, public education efforts, a visitor use map (with ORV policies described) and BLM ranger patrols should be adequate to ensure compliance with ORV management policies.

36



THE WILDLIFE SOCIETY, ARIZONA CHAPTER  
PO Box 11135  
Phoenix, AZ 850 17

26 April 1988

Mr. Arthur E. Tower  
Phoenix, Resource Area Manger  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

The Wildlife Society (TWS) appreciates the opportunity to comment on the Draft Phoenix Resource Management Plan and Environmental Impact Statement (RMP). We commend the Bureau of Land Management on the proposed designation of seven Areas of Critical Environmental Concern (ACEC). Our main comments on the RMP involve requests for ACEC boundary modifications; impacts to Federally threatened and endangered (T&E) species, riparian habitats, and Sonoran Desert upland bajadas; and the inadequate management prescriptions. Please consider the following comments.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

1. TWS strongly supports ACEC designations for Baboquivari Mountains, Waterman Mountains, White Canyon, Perry Mesa, Larry Canyon, Tanner Wash, and Appleton-Whittell. We request, however, a more detailed analysis of areas that were rejected for this designation.

36-1 2. We urge implementation of Alternative C for Perry Canyon ACEC and the expansion of the boundaries to include T. 10N., R. 3E., Sections 10, 11, and 12. This expansion will allow acquisition of Gila intermedia and riparian habitat. This riparian habitat includes cienea and deciduous broadleaf riparian forest components.

36-2 3. We also urge implementation of Alternative C boundary designations for the Waterman Mountains and Tanner Wash to maximize known and potential special status species habitat. Sections T. 18N., R. 21E., Section 11 and 15 contain a candidate category I endangered plant and should be acquired as part of the Tanner Wash ACEC.

36-1. Refer to responses 22-4 and 22-5.

36-2. Refer to responses 3-2 and 29-12.

36-3 4. TWS requests that the Black Canyon RCA boundaries be modified to include T. 11N., R. 2E., E 1/2 Section 22, E 1/2 Section 27, and E 1/2 section 34. In addition, acquisition of T. 12N., R. 3E., E 1/2 Section 6, and T. 13N., R. 3E. SW 1/4 Section 31 **would** ensure federal protection of the entire perennial **stretch** of Ash Creek.

#### THREATENED AND ENDANGERED SPECIES

36-4 5. Implementation of this RMP constitutes a major federal action and therefore requires consultation with Fish and Wildlife Service under Section 7 of the Endangered Species Act for T&E species affected by this **action**. Impacts to affected T&E species are inadequately described in this document and should be analyzed in a separate biological assessment. Both positive and negative impacts will result from land disposal and acquisition and from changes in land management practices. In addition, BLM should confer with FWS regarding impacts to Federally proposed species.

36-5 6. This RMP is an appropriate vehicle to define Recovery Plan objectives and actions for T&E species affected by this action. BLM should use this planning document to meet and enhance the objectives of existing recovery plans.

36-6 7. TWS is concerned that disposal of land with candidate species listed in Appendix 9, without proper assessment, may necessitate listing of those species later. This conflicts with BLM policy to "identify habitat improvement or expansion efforts required to **downlist** or **delist** a species." BLM should strive to retain lands containing special status species within Federal ownership.

36-7 8. The bald eagle recolonization of the **Agua Fria** will be greatly affected by BLM management of **riparian** habitats in Black Canyon and Lake **Pleasant RCAs**. Bald eagle nesting trends should be discussed in this document and BLM should consider the entire drainage as a single ecological unit when prescribing management for this area.

36-8 9. BLM should reconsider the proposed disposal of Little Colorado River spinedace habitat on Silver Creek. This is the only Federally owned parcel of land along this creek **below** the town of Silver Creek. This **land** should be retained in Federal ownership to ensure the **continued** survival of this species and allow for future recovery efforts.

36-9 10. Disposal of land containing populations of paperspined **cactus** would lead to the decline of this species, however, the RMP states that "... most of the populations occur in New Mexico and habitat loss in Arizona is not expected to affect its **status**." We question whether this habitat disposal is **an** insignificant **impact** to this species. In Arizona, 43 occurrences are

36-3. Refer to responses 29-11 and 29-12.

36-4. Refer to response **12-1** and the General Response to Comments on Section 7 Consultation.

36-5. Recovery plan objectives are incorporated into the management goals and/or planned actions for **ACECs** and special management areas recommended in the proposed **RMP**.

36-6. The final decision to dispose of land with candidate species rests upon the results of environmental assessments made when a specific disposal action is proposed. All environmental values are considered in the assessment, including those not considered issues in this **RMP/EIS**.

36-7. The U.S. Fish and Wildlife Service, which administers compliance with the Endangered Species Act, agrees with the **BLM's** assessment of the alternatives' impacts to the bald eagle in the Agua Fria River area.

36-g. Refer to response 22-3.

36-9. Refer to response 34-S.

36-9 | documented in the state at 16 localities, 6 of which are on BLM land. The remaining 10 occurrences of the paperspined cactus are on State and private land receiving no formal protection. These 6 occurrences should be retained in Federal management to avoid the future need to list this species.

RIPARIAN HABITATS

36-10 | 11. TWS considers riparian habitats to be the most endangered habitats in Arizona and is concerned with the disposal of riparian habitats from Federal ownership through several of the RMP alternatives. BLM is required to comply with Executive Orders 11988 and 11990 and the BLM National Riparian Policy which require that riparian areas be retained in federal ownership "less disposal is in the public interest. This document has not adequately shown that the proposed riparian habitat disposal is in the public interest. TWS urges BLM to reconsider disposal of riparian habitats and to strive to place additional acreage under Federal ownership.

12. It is difficult to match many of the maps with the associated tables to follow BLM's analytical processes.

36-11 | 13. Table 4-3 should show which riparian habitats are decreased and which are increased by each alternative.

14. BLM should implement Alternative C for Larry Creek and White Canyon riparian areas to ensure management of upland watersheds.

36-12 | 15. Management of designated riparian areas should include elimination of woodcutting, an activity which is generally adverse to a healthy riparian habitat.

SONORAN DESERT UPLAND BAJADAS

36-13 | 15. The Sonora" Desert bajadas are extremely unique and diverse habitats found in Arizona. Most of these habitats around Phoenix and Tucson are directly or indirectly impacted by housing developments. TWS recommends that the BLM reconsider disposal of lands with high quality Sonoran Desert bajada values and consider acquisition of additional parcels of this habitat. Specifically, the Silverbell Mountains, Picacho Mountains, Suizo Mountains, and Tortolita Mountains contain quality Sonora" Desert bajada habitat.

36-14 | 17. BLM should specifically prohibit the development of a road to the Newman Peak communications site to avoid severance of this habitat.

36-15 | 18. We commend BLM for the concept of a desert tortoise management area, but believe the current BLM boundaries for the Picacho Mountains to be inadequate for such a designation. The current boundaries omit from BLM management the bajada which contains the majority of desert tortoise

36-10. Refer to response 22-12.

36-11. Refer to Appendix 7 in the draft RMP/EIS.

36-12. The Phoenix Resource Area does not currently issue woodcutting permits. Activity planning for special management areas and ACECs would address any problems associated with woodcutting, if appropriate.

36-13. Refer to response 34-22.

36-14. Refer to response 29-7.

36-15. Refer to response 18-7.

36-15 habitat. We recommend that BLM expand the current management boundaries in the Picacho Mountains to include ~~bad~~ habitat which will enable conservation of a minimum viable population of desert tortoises. Increasing the management area size will ensure conservation of a more inclusive ecosystem for all the species in the Picacho Mountains, especially with increased development in this area over the next 20 years.

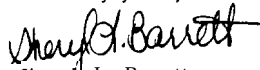
36-16 19. In addition to bighorn sheep, the Silverbell Mountains also contain a healthy population of desert tortoises. This area should be managed as both a bighorn sheep and desert tortoise management area since management objectives and goals would be compatible for the two species. BLM should implement the expanded boundaries provided in Alternative C for the Silverbell Mountains for more effective bighorn sheep management.

#### OBJECTIVES AND PRESCRIPTIONS

36-17 20. The objectives and prescriptions presented in Chapter 2 are generally vague and unmeasureable. Without detailed prescriptions, it is impossible to follow BLM's impact analysis of RMP implementation. At a minimum, BLM should define management objectives and prescriptions for riparian areas, T&E species, and other wildlife. Without better defined objectives and prescriptions, the document fails to meet Federal Land Policy and Management Act guidelines for wildlife resources.

Again, thank you for the opportunity to comment on this RMP. Should you require further clarification of any of the above comments, please contact The Wildlife Society at the above address.

Sincerely yours,



Sheryl L. Barrett  
President-elect  
Arizona Chapter

36-16. Refer to response 18-6.

36-17. Refer to the General Response to Comments on the Planning Process.

37

MCKINLEY COUNTY WILDLIFE FEDERATION  
1420 Monterey  
Gallup, New Mexico 87301

23 April 1988

Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
Phoenix Resource Area  
2015 W. Deer Valley Road  
Phoenix Arizona

Dear Mr. Tower:

The McKinley County (New Mexico) Wildlife Federation appreciates the opportunity to comment on the Phoenix Resource Management Plan and Environmental Impact Statement.

Our organization has recently become sensitized to the importance of BLM Land Management Plans as they affect the quality of life in our region. We realized almost too late that the New Mexico BLM Farmington Resource Area Management Plan included a plan to dispose of all "vacant public land" in McKinley County, New Mexico. Now we come to understand that the Phoenix Resource Area Management Plan proposes a similar "disposal plan" for all the public land in Apache and Navajo Counties, Arizona. We believe these plans taken individually and collectively reflect an abandonment of public interests in the protection and management of wildlife habitat and other natural resource management interests in our region of Arizona and New Mexico. We believe the "synergistic" effects of these plans which, if implemented, would result in the total loss of public rangelands in East Central Arizona and West Central New Mexico, would result in irretrevable and irreversible loss of wildlife habitat, open space and natural resource management in this region.

37-

As we understand the plan there would be almost total disposal of BLM Lands in Navajo County, and two fifths of the public land in Apache County under all but the "no action" plan. However, we come to this conclusion by the circuitous method of examining Table 4-1 which shows loss of Payment in Lieu of Tax Revenues. It is very distressing that the plan does not show in map form which specific public lands would be disposed of in Apache and Navajo Counties. We would request that these lands be specifically identified and subject to public review before the plan is finalized.

37-2

A second issue where information is not apparently accurate is in map 3-4C purporting to show "Medium to High Density Pronghorn Antelope Habitat" in the Apache-Navajo Portion of

37-1.

The land tenure adjustment issue is discussed on page 20 and under each alternative in Chapter 2 of the draft RMP/EIS. Under Alternatives B and C, it would be the BLM's intent to consolidate public land into Resource Conservation Areas (RCAs) and Cooperative Recreation Management Areas (CRMAs). Public land outside the RCAs and CRMAs are identified for disposal to another federal agency (i.e., public land bordering the Petrified Forest National Park and the Saguaro National Monument), to local governments under the Recreation and Public Purposes Act (R&PPA), by exchange or sale (land identified in Appendix 1) or by exchange only.

37-2.

According to the Arizona Game and Fish Department Pronghorn Distribution Map (1985), the area from St. Johns to Sanders supports very sparse to sparse densities of pronghorn.

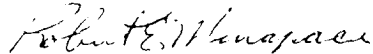
- 37-2 the Resource Area. We believe that the region between Sanders and St. Johns along US 666 should reflect a medium, if not high Pronghorn density.
- 37-3 On page 23 the plan mentions that "4000" acres have been identified for disposal to benefit the Petrified Forest National Park" and an additional 45236 acres have been identified as suitable for disposal through state indemnity selection, state or private exchange or sale." We can find nowhere where these lands are identified. Would these lands include what we believe may be part of the medium to high density pronghorn habitat (see above)? By inspection of table 4-1 it would appear that three-fourths of this land would come from Apache and Navajo Counties. Is this a correct inference?
- 37-4 It also would appear that riparian habitat, while increased overall in the RMP would be decreased in the Apache-Navajo portion. Specificity in the plan is requisite to be sure of this conclusion. But the pattern of substantial loss of habitat resources in the Apache-Navajo portion is of concern.
- If we are correct in this analysis we have grave concerns over the withdrawal of federal public land management on both sides of the New Mexico and Arizona State line as it will effect the ability to manage wildlife and riparian habitat in this region. To this end we propose the following:
- 37-5 1) BLM identify a "Special Management Area" in the Zuni River, Surprise Creek and Hardscrabble Wash Region. This SMA would also constitute a land acquisition and consolidation zone for Pronghorn habitat. An additional benefit of consolidation and intensive management in this area would be protection of important but badly vandalized cultural resources in this zone.
- 37-6 2) BLM identify all natural surface water sources and riparian habitat as retention zones, "Publ IC Body Exchange Only" zones (State, National Park Service, F&WS), or BLM acquisition zones. The ability to manage and promote wildlife values in arid regions is based largely on the ability to manage and protect water sources from incompatible uses, as you recognize by the special attention given to riparian habitat in your plan. The special concern already given to these zones needs to be redoubled beyond the acreage calculations. Land consolidation and acquisition should take place in areas like the Little Colorado River in the Woodruff area and the Fierco River between Petrified Forest and Halbrook, where existing BLM holdings already form protective anchors which should be expanded.
- 37-3. Refer to responses 37-1 and 37-2.
- 37-4. Appendix 7 of the draft RMP/EIS shows which riparian habitat would be considered for disposal under each alternative.
- 37-S. BLM parcels in the region are identified for acquisition by the state of Arizona. The state is bound by terms of a Memorandum of Agreement to manage the cultural values in a manner consistent with federal laws and regulations. An aerial surveillance program, jointly managed by federal and state agencies, exists in the Zuni-Hardscrabble region of Apache County. This program is designed to deter archaeological vandalism.
- Alternatives for consolidating more public land in Apache and Navajo Counties were considered but not carried forward for the reasons stated on page 41 of the draft RMP/EIS.
- 37-6. Refer to responses 3-2, 22-3 and 22-12.

37-7

3) BLM should allow no net loss of Public land values in Apache and Navajo Counties. Exchanges should be allowed only within the Apache-Navajo portion for consolidation and management. A net loss of public land values in this portion creates an undue hardship on the local public. When combined with similar BLM plans on the New Mexico side Of the State line, the combined effects will result in a severe impact on the wildlife and recreation opportunities in this portion of the Colorado Plateau. This result would be unfair and unacceptable to our population.

We appreciate the opportunity to comment on the Plan and hope that our comments will result in a more beneficial plan for the wildlife and human populations of Apache and Navajo Counties in Arizona and McKinley County in New Mexico.

Sincerely,



Robert E. Menapace

37-7.

Exchanges are not projected to cause a significant loss of public land values such as wildlife or recreational values. Little change from current land uses is expected as a result of proposed exchanges.





IN REPLY  
REFER TO: LC-159

38

United States Department of the Interior

BUREAU OF RECLAMATION  
LOWER COLORADO REGIONAL OFFICE  
P.O. BOX 427  
BOULDER CITY, NEVADA 89005



APR 2 1988

Memorandum

To: Mr. Arthur E. Tower, Phoenix Resource Area Manager,  
Bureau of Land Management, 2015 West Deer Valley Road,  
Phoenix, Arizona 85027

From: **ACTING** Regional Director

Subject: Review of Draft Phoenix Resource Management Plan and Environmental  
Impact Statement (RMP/EIS) (your notice of January 22, 1988)

We have reviewed the subject RMP/EIS and have the following comments to  
offer.

General comments

Picacho Mountain Resource Conservation Area (RCA) - The majority of  
tortoises encountered and tracked by radio telemetry during Bureau of  
Reclamation (Reclamation) sponsored wildlife studies have been found on the  
bajadas outside of the boundaries of the currently proposed Picacho Mountain  
RCA. These bajadas contain the most diverse habitat and species composition  
in this mountain range. Specifically, tortoises were located in T. 8 S.,  
R. 9 E., sections 16, 21, 28, 34, and 35 (see enclosed map). This RCA is  
proposed as a Tortoise Management Area. In order to maintain or improve the  
capability of important habitat to support existing populations, we believe  
it is critical that these areas be included in the RCA. This will enable  
BLM to preserve the most intensely studied tortoise population in Arizona.  
Although Reclamation did not conduct tortoise studies on the east side of  
the mountain, we expect these bajadas to be just as important to resident  
wildlife. For these reasons, we recommend acquisition of an additional  
square mile around the presently proposed Picacho Mountain RCA.

We also recommend against increased recreation in the Picacho Mountains due  
to the detrimental impacts this would have on the desert tortoise  
population. Impacts on this species from intense human disturbance have  
been observed with the decline of tortoises at Picacho Peak State Park. We  
would discourage advertisement of this area as a tortoise management area,  
to avoid genetic pollution and introduction of diseases into the wild  
population through captive tortoise releases. This problem has persisted at  
the Desert Tortoise Natural Area in California.

Maps - For future draft EIS's, it would be helpful to the reader if the EIS  
contained a map of each portion (e.g., South Central, North Central and  
Apache-Navajo) that identifies all the various designations (RCA; ACEC; SMA;  
CRMA; R&PPA; and utility corridors) that are proposed for that portion.

38-1. Refer to response 18-7.

WRITTEN COMMENTS AND RESPONSES

Lake Pleasant - It is our understanding the agreement regarding the management of the Federal lands "t Lake Pleasant, that will be used for Reclamation purposes, will be the responsibility of Reclamation. These lands will be available for public recreational use. The size of the Regional Perk has not yet been finalized but will be jointly determined by Reclamation and the Bureau of Land Management (ELM).

Chapter 1 - Planning Issues, Page 5 , Issue 2 , Utility Corridors and Communication Sites

38-2 Have analyses been conducted to determine whether or not the capacity or capability of the planned corridors "nd communication sites will meet the anticipated needs of the area?

38-3 As part of its Central Arizona Project (CAP) system, Reclamation plans to construct a microwave communications site on Helmet Peak in section 11 of T. 17 S., R. 12 E. Will this constitute a conflict with the RMP's proposed utility corridors and communication sites?

Environmental Issues Considered but not Analyzed, Bald Eagle, Page 10

38-4 The RMP/DEIS states that BLM acquisition of a nest site "t the upper end of Lake Pleasant would not significantly change the current management of bald eagle habitat. We would agree with this statement ONLY if BLM continue." enforcement of public closures that are now in effect during the eagle breeding season. We recommend the RMP/DEIS reiterate this commitment to do so.

Chapter 2, Description of Alternatives

38-5 Environmental Management, Page 19 - Regarding the statement that ELM will conduct protected plant and cultural resource clearances "s a part of the environmental analysis process, what percentage of land will be surveyed to assess impacts of land disposal?

38-6 Table 2-4, Pages 28-30, Under "Planned Actions" - Does prohibition of land use authorizations in riparian areas mean that gravel mining would be prohibited in the riparian zone? We recommend the EIS indicate whether or not gravel mining would be allowed.

38-7 Table 2-4, Page 29, Gila River Riparian Management Area If built, Buttes Dam--an authorized feature of the CAP--would result in the inundation of much of the Gil" River Riparian Management Area by the dam's reservoir pool. This possibility and its implications to BLM's proposed action should be discussed in the EIS.

38-8 Issue 5 - Recreation Management, R&PP Transfers, Page 32 - The CAP's Tucson Aqueduct, Black Mountain Pipeline will require approximately 35 acres of public domain lands located in the W<sup>1</sup>W<sup>1</sup>E<sup>1</sup> of section 11 of T. 15 S., R. 12 E., G&SRM. Reclamation anticipates a permanent easement will be acquired. The draft EIS identifies this area "s being transferred to Pim" County for park development. Any future us" of

38-2. The proposed location of corridors and communication sites resulted from comments received during the issue identification and alternative formulation phases of the planning process. Comments from the industry (Western Regional Corridor Study) as well as the needs of existing users and forecasted future demand were used to develop alternatives.

38-3. In our discussions with the Bureau of Reclamation, Helmet Peak was not identified as a communication site for the CAP. Applications by the Bureau of Reclamation for communication sites would continue to be considered until disposal occurs.

38-4. The site would be protected in compliance with NEPA, the ESA, and other applicable laws and regulations (see the "Environmental Management" section on page 19 of the draft RMP/EIS).

38-5. The percent coverage of land surveyed depends on 1) how much is known about the resources on the land, 2) whether the area is near to known critical or important resources and 3) whether the disposal is a private or state exchange.

38-b. Gravel extraction restrictions apply only to the riparian areas where land use authorizations are prohibited. The prohibition does not apply to group recreation use permits where the BLM is satisfied that such use will not harm riparian values.

38-7. In the absence of receiving the Bureau of Reclamation's identification of plans and recommendations concerning the Buttes Dam site during the issue identification and alternative development phase of the draft RMP/EIS, the BLM has not included the impacts of the dam on resources along the Gila River.

When the schedule and specifications for the Buttes Dam become available and its effects can be estimated an amendment to the RMP would be considered.

38-8. **Pima County** has indicated that the easement required by the Bureau of Reclamation would not interfere with park development of the area. Refer also to response 11-1.

these lands would need to comply with the stipulations of our easements.

38-9 Map 2-1, Resource Conservation Areas (South Central Portion), Page 44 • In the Picacho RCA erroneously coded as Alternative C (should be coded as Alternative B)?

38-10 Map Z-21, Silver Bell RCA Special Management Area, Page 69 • Reclamation has recently purchased 4 square miles of State land in T 14 S., R. 11 E., sections 10, 11, 14, and 15, as a wildlife mitigation corridor for the CAP. This parcel of land will allow wildlife movements to continue from the Tucson Mountains west to the Roskrige Mountains. In addition, the Tohono O'odham Nation is considering designating a portion of the northern part of the Garcia Strip as a wildlife movement corridor, in T. 14 S., R. 11 E., sections 16, 17, and 18. These two corridors would directly tie into the proposed Silver Bell RCA where it follows the northern boundary of the Nation. Should this occur, we recommend that BLM acquire the SE of T. 14 S., R. 11 E., section A as part of the Silver Bell RCA. This acquisition would allow a continuous wildlife movement corridor across Avra Valley.

#### Chapter 3, Affected Environment

38-11 Map 3-3A, Special Status Plant Habitat (South Central Portion), Page 111 • Reclamation has been informed by Fish and Wildlife Service that potential Tumamoc globe-berry habitat extends north to the Gila River.

#### Chapter 4, Environmental Consequences

38-12 Impacts of Alternative B, Effects on Watershed Condition, Page 142 • A statement in the first paragraph on page 142 is somewhat confusing. This sentence reads "Under Alternative B, ORV restrictions or transfer of ownership would prevent further degradation to 182,000 acres of land currently held in public ownership." Is it that further degradation would likely occur but the land would no longer be in public ownership, or that transfer of ownership would prevent further degradation? If it is the latter, please explain how the transfer of ownership would prevent further degradation to lands.

38-13 Effects on Areas of Cultural Significance, Page 143 - How did you arrive at the figure of 10-25 percent arrived at in determining the degree of cultural value of sites lost on lands identified for disposal?

Effects on Recreation Use, Page 149 • We recommend BLM consider inclusion of bajada habitats in its acquisition for cooperative parks, especially at Tortolita Mountains, as wildlife protection areas

38-14 Alternative C, Effects on Desert Tortoise, Page 155 • This discussion states all 60,000 acres of important desert tortoise habitat would be retained. The Alternative B discussion states all 61,300 acres of important desert tortoise habitat would be retained (page 147). Please correct or clarify this inconsistency.

We would appreciate receiving a copy of the final RMP/EIS when it becomes available.

38-9. The comment is correct; the Picacho Mountains RCA is proposed in the draft RMP/EIS only under Alternative B.

38-10. We appreciate the need to create wildlife corridors in the Avra Valley. The parcel which the BOR requests that the BLM acquire, however, is private land outside the Silver Bell RCA boundary. The BLM's priority for acquisitions is to consolidate public land holdings in the proposed RCA, principally through exchange with the state. Private exchanges would be considered only if the BLM is approached by the landowners with a proposal.

The key to the corridor's success seems to be the Garcia Strip designation. When the Tohono O'odham land is designated for use as a wildlife corridor, the need for additional corridor land can be discussed.

38-11. The map depicts the extent of known or high potential habitat. It does not show either the extent of known habitat within the Tohono O'odham Reservation or the extent of lower potential for occurrence to the north. The BLM continues to conduct field surveys for Tumamoc globeberry within all areas considered potential habitat.

38-12. We have assumed that the transfer of land from public to private ownership would prevent degradation due to ORV use. It is assumed that the private landowner would restrict access and ORV use.

38-13. As stated in the footnote to Table 4-2 on page 129 of the draft RMP/EIS, these are relative values arrived at by the interdisciplinary team archaeologist and were based on his analysis of the available data.

38-14. In the discussion of the effects on desert tortoise under Alternative C, page 155 of the draft RMP/EIS, the word "all" should be deleted from the first sentence of the third paragraph.

The sentence is revised to read: Under Alternative C, the BLM would retain 60,000 acres of important habitat, acquire 15,200 acres of important habitat and dispose of 1,600 acres of important habitat.

William E. R...



39

## ARIZONA MINING ASSOCIATION

DAVID C. RIDINGER  
President

April 29, 1988

Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

PHOENIX RMP/EIS

Set forth below are our comments on the above-referenced draft, dated December 1987. These comments are submitted on behalf of the Arizona Mining Association and its member companies:

Amax Mineral Resources Company  
Anamax Mining Company  
ASARCO Incorporated  
Callahan Mining Corporation  
Cyprus Minerals Company  
Homestake Mining Company  
Inspiration Consolidated Copper Company  
Magma Copper Company  
Phelps Dodge Corporation

Our comments are general in nature and scope; we appreciate the opportunity to make comments.

39-1

1. In executing land disposals and exchanges, proper consideration should be given all existing or known mineral resources and "active" mining claims. Blocking up ownership of entire potential orebodies should be avoided, if possible; i.e., geologic indicators of orebody boundaries should be used to consolidate land ownership so that potential orebodies are not divided. Also, mining claimants should not be required to prove validity of a claim if it is being actively worked.

Arthur E. Towers  
April 29, 1988  
page 2

39-1

2. When special management designations (ACEC's, SMA's and RCA's) are made, mineral resources existing in those areas should receive adequate consideration, allowing for mineral exploration and development.
3. Before certain ACEC's, etc. are withdrawn from mineral entry, thorough minerals inventory assessments should be made. Rational decisions on land use and management cannot be made prior to proper study of the minerals and values that may be contained in a specific area.

If you would like to discuss any of the above points, please advise.

Sincerely,

David C. Ridinger

39-1.

Every effort has been made to identify areas where important mineral development can be expected in the future. Only proposed ACECs and other special management areas with critical natural resources especially sensitive to mining activity have been identified for special protection measures.



United States Department of the Interior

NATIONAL PARK SERVICE

Petrified Forest National Park  
Arizona 86028

IN REPLY REFER TO:

L14

May 5, 1988

Mr. Arthur E. Tower  
Bureau of Land Management  
Phoenix District Office  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

40-1

We appreciate the concern shown for addressing the needs of Petrified Forest National Park as addressed in the Plan. At present, the National Park Service is beginning an evaluation process of adjoining lands for potential values that would merit their inclusion in Petrified Forest National Park. The attached map shows the extent of these study areas. Bureau of Land Management lands in the study areas are shown in a stipple pattern. We look forward to continued cooperation with BLM in this study.

40-2

Should the Bureau of Land Management retain any lands adjoining Petrified Forest National Park, we would like to see a limitation placed on off-road vehicles on those lands. To date, we have had only a few instances of ORV trespass on park lands, but some have included the park's National Wilderness Area. In the future, such problems can only be expected to increase. Limitations on ORV use on adjacent lands would protect not only those lands, but adjacent park and wilderness values. Such values include not only the traditional values of scenic beauty, solitude and a natural environment, but also the extensive paleontological and archeological remains of the area.

Thank you for this opportunity to comment during your planning process. If we can be of further help or offer additional clarifications, please don't hesitate to call on us.

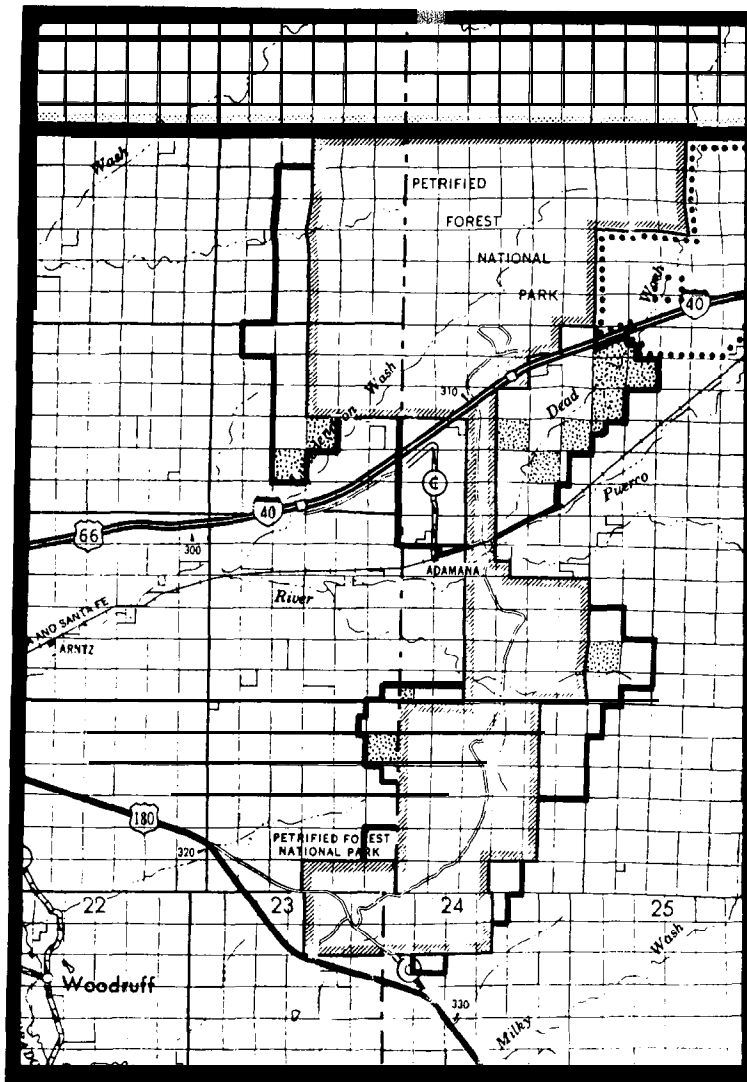
Sincerely,

L. Edward Gastelum  
Superintendent

Enclosure

- 40-1. Public land identified for possible inclusion into the Petrified Forest National Park includes the public land directly adjacent to the existing park boundary.
- 40-Z. The land would be classified as a limited ORV designation area with off-road-vehicle use restricted to existing roads and routes.

40



PETRIFIED FOREST NATIONAL PARK

Evaluation Lands within heavy border

Bureau of Land Management lands within study area are stippled



# SIERRA CLUB

RECEIVED

BLM, PHOENIX DIST. OFFICE  
PHOENIX, ARIZONA  
Grand Canyon Chapter, Arizona

RINCON GROUP

MAY 04 1988

AM 7:8,9,10,11,12,1,2,3,4,5,6 PM

April 30, 1988  
117 N. 2nd Avenue  
Tucson, AZ 85705  
792-2690

Arthur E. Tower  
Manager, Phoenix Resource Area  
Bureau of Land Management

Dear Mr. Tower:

I would like to offer several additional, if tardy, comments on the Phoenix Resource Management Plan and Environmental Impact Statement. These are intended to supplement my letter of April 29, 1988.

The RMP development team did a good job of presenting information on riparian areas in general and on the status of riparian areas within the Phoenix Resource Area (pp. 107-110). However, the RMP shows a glaring omission in its lack of general management prescriptions for those riparian areas. The need for such management is clearly stated: "of the 93 miles of riparian habitat, six miles is in good ecological condition, 80 miles is fair and seven miles is poor." (p. 108) Table 3-14 (p. 109) shows that only 0.4 mile of riparian habitat is in "excellent" condition, and that all areas show a static or downward trend.


Given the clear and explicitly stated value of riparian areas, BLM's ultimate goal should be to improve all its riparian lands to "excellent" condition. The minimum acceptable goal for this RMP is to improve every riparian area to the next higher status: poor up to fair, fair up to good, and good up to excellent. That goal should be clearly stated in the RMP, along with specific management steps to be followed for achievement of the goal.

The RMP does mention improvement of riparian habitat in the handful of Areas Proposed for Special Management, but even there the "Planned Actions" do not contain the single most important action for riparian recovery: an end to livestock grazing. Proper management of all riparian areas, especially those with SMA or ACEC status, must include cattle exclosures or other mechanisms to eliminate grazing pressure on riparian vegetation.

41 One other major omission is a means to judge the progress and effectiveness of the RMP. This document should include achievable, measureable objectives, along with methods of monitoring progress, a monitoring schedule, and remedies to perform if monitoring shows that progress is not meeting the planned objectives. The monitoring plan should include wildlife status, riparian habitat and watershed condition.

Without these inclusions, the RMP will have limited effectiveness on conditions within the Phoenix Resource Area.

Yours,



Dale S. Turner  
Conservation Chair  
Rincon Group

41-1. Refer to the monitoring and evaluation plan in Appendix 12 of the draft RMP/EIS and the monitoring plan in the proposed RMP in this document.



# Arizona Cattle Growers' Association

Publishers of Arizona Cattlelog

1401 North 24th Street, Suite #4 • Phoenix, Arizona 85008 • Telephone (602) 267-1129

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Bob Bowman, Sonoma  
\*Deceased

Hay 6, 1988

Mr. Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Tower:

The Arizona Cattle Growers' Association submits these comments regarding the Phoenix Resource Management Plan and Environmental Impact Statement Draft.

Our members who ranch in the Phoenix Resource Area have not advised us of specific concerns regarding the Draft Plan which they would have us address on their behalf. We do, however, wish to offer a general statement of consideration regarding Land Tenure Adjustment, Areas of Critical Environmental Concern, Riparian Habitat, and Wildlife Resource Management.

Land Tenure Adjustment -- We understand the desire of the agency to block up areas of land in federal ownership to "eliminate management complications caused by checkerboard ownership." Our concern is that those blocks of public lands continue to be managed for multiple use and continue to be available for grazing use.

Areas of Critical Environmental Concern (ACECs) -- We are uncertain as to how these areas, once designated, are intended to be managed. Will they still be managed for multiple use? We would object to them being managed as the equivalent to wilderness areas without having earned wilderness designation.

Riparian Habitat -- We are concerned that too often in the management of riparian habitat the value of using livestock grazing as a management tool is overlooked. We would not wish to see riparian areas arbitrarily closed to grazing.

Wildlife Resource Management -- Wildlife and wildlife habitat on BLM land are managed under a memorandum of understanding with the Arizona Game and Fish Department. He would not wish BLX to abdicate its responsibility for resource management to the detriment of livestock grazing. The resource must be managed to continue to support at least the present level of livestock grazing.

The Resource Management Plan and the Preferred Alternative B reflect a great amount of effort and consideration on behalf of the Bureau of Land Management. Thank you for your efforts and for your further consideration of the concerns which we have expressed.

Sincerely,

*Pamela Neal*  
Pamela Neal  
Executive Vice President



42-1.

The blocks created by consolidating public ownership would continue to be managed for multiple uses. Restrictions on grazing and other uses may be proposed for specific, discrete areas if necessary for the protection of specific values. The need for any land use restrictions not identified in the proposed RMP would be identified in the development of activity plans for ACECs and special management areas. Public land users affected by any proposed land use restrictions would be asked to participate in the development of these activity plans.

42-2.

ACECs would be managed to protect the resource values for which they were established. In most cases, this means that current uses will continue but be closely monitored.

42-3.

See response 42-1 above.

43



**DAVID E. ZINN**

~~June - November~~ General Delivery, Wise River, MT 59762 • (406) 832-3184  
December - May: 6220 East Northern Ave., Scottsdale, AZ 85253 • (802) 948-0684

May 5, 1988

Bureau of Land Management  
2015 W. Deer Valley Rd.  
Phoenix, AZ 85027

Attn: Arthur E. Tower

Dear Mr. Tower:

Unfortunately I just received your notice regarding the submittal of comments concerning the seven special management areas (one million acres) you plan to control to **perserve** fragile **resouces** and increase management efficiency. Although too late to meet your April 29th deadline, I hope my comments will be accepted and considered.

I don't know what you mea by "increase management efficiency". If efficiency means increased **utilization**, particularly by ranching, le. more cattle allotments, I em absolutely against it. The BLM land I hunt quail on here in Arizona is for the **most part continually overgrazed**, and I have had a tough time finding areas with-enough cover to support quail since I moved here in 1968. The only lands more overgrazed than BLM land are State Land (a real disaster) or the rancher's own private land.

43-1 I would hope that the **areas** referenced the April 15, 1988 Arizona Outdoor News, in particularly the Empire Ranch, will see very much REDUCED grazing in the future, balancing out the hunting and recreation users interests for a change.

We bird hunters living in Phoenix find we have to drive at least two hours to the higher elevations of National Forest administered areas to find sufficient cover to support **quail** populations, meanwhile driving past vast uninhabited, bare as a billiard table, deeply eroded, stark, sand and rock vistas devoid of grass, stretching for miles, as far as the eye can see (non-believers can simply try driving north on I-10 out of Phoenix for confirmation). I will admit that the initial stretch is State land, but it is **difficult** to note any difference at the BLM boundaries

Let's hope that you can do a better job in the future to protect and preserve our public lands, at least these seven special management areas. I would love to congratulate you for managing OUR public lands for the balanced interests you are mandated to serve instead of simply folding under the pressure of the ranchers. Remember there are now many more VOTING **recreationists** than ranchers. I offer my services to help work the problem. Meanwhile I await examples to laud your efforts.

Sincerely,

*David E. Zinn*  
David E. Zinn - Scottsdale, AZ

RECEIVED  
BLM, PHOENIX DIST. OFF.  
PHOENIX, ARIZONA  
MAY 10 1988  
U.S. DEPT. OF THE INTERIOR

43-1. In June 1988, the BLM acquired by exchange 41,000 acres within the Empire, Cienega and Rose Tree ranches near Sonoita, Arizona. In addition to extensive grazing land the ranches include important riparian areas, endangered species habitat, big and small game habitat and open space for recreation activities. Land use planning for this acquired land is scheduled to begin in 1989. The resulting plan will become an amendment to this RMP.



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94106

9 MAY 1988

Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 W. Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

The Environmental Protection Agency (EPA) has reviewed the Phoenix **Resource** Management Plan and **Draft** Environmental Impact **Statement** (DEIS). Under the National Environmental Policy Act and Section 309 of the Clean Air Act, EPA is required to review and comment on this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns-Insufficient Information (see the attached "Summary of Rating Definitions and Follow-up Actions). Our rating reflects concerns we have with existing watershed and riparian habitat conditions in the Phoenix Resource Area and the potential attendant water quality impacts. We have enclosed comments regarding this DEIS.

EPA supports the acquisition of privately owned riparian areas proposed under Alternatives B and C. The management activities and restoration measures which will ensure protection of these areas and improve watershed and riparian habitat conditions should be discussed in the final EIS. EPA also commends the controls proposed for off-road vehicle (ORV) use under alternatives B and C. Watershed conditions and water quality should benefit from the closure of open ORV areas.

We appreciate the opportunity to review this DEIS. Please send us two copies of the final EIS when it is filed with the EPA Headquarters office. If you have any questions, please call me at (415) 974-8083 (FIS 454-8083), or have your staff contact David Powers at (415) 974-8107 (FIS 454-8187).

Sincerely,

Deanna M. Wieman, Director  
Office of External Affairs

9 MAY 1988

-1-

= Comments on the Phoenix Resource Management Plan and Draft Environmental Impact Statement:

Water Quality

1. Page 10 of the DEIS states that "the lack of baseline and pollution source data precludes a reasonably accurate prediction of the impacts resulting from any of the alternatives. Therefore, further description of impacts to water quality will be indirectly assessed under the watershed conditions issue." We strongly recommend that the Bureau of Land Management (BLM) coordinate closely with the Arizona Department of Environmental Quality (ADEQ), the Arizona Game and Fish Department, and the U.S. Fish and Wildlife Service to determine existing water quality and protected use baseline conditions and to identify pollution sources.

Section 319 of the Water Quality Act of 1987 established a new program which requires states to ASSESS nonpoint source pollution problems, develop a nonpoint source pollution management program, and implement controls to improve water quality. Identified control measures should be implemented on BLM lands to address nonpoint source pollution problems. ADEQ is in the process of assessing nonpoint source pollution problems statewide. Their recently completed 305(b) Biennial Water Quality Report may also contain information which can be used to supplement BLM's existing data on watershed, riparian, and water quality conditions in the final EIS. Additionally, the information BLM staff obtain during grazing allotment evaluations may assist ADEQ in the development of their nonpoint source pollution management program.

44-1 2. Page 109 and 110 of the DEIS identify nine specific riparian areas (17.2 acres) on BLM lands where ecological conditions are in poor condition and/or in a declining trend. Page 99 of the DEIS indicates that 182,000 acres of watershed are in satisfactory condition but are highly susceptible to erosion. An additional 348,000 acres of watershed are classified as being in unsatisfactory erosion condition. The final EIS should discuss special management practices which will be afforded to sensitive watersheds and watersheds in unsatisfactory erosion condition. Restoration treatments which will be applied to watersheds in unsatisfactory condition and a priority list and timetable for implementation of those treatments should also be discussed in the final EIS.

3. EPA supports the acquisition of 53 miles of riparian habitat proposed under Alternatives B and C. The existing ecological conditions and trends of the habitat to be acquired and the 20 miles of riparian habitat to be transferred to private or state ownership should be discussed in the final EIS.

44-1. As stated in the draft RMP/EIS, Category IV watersheds scheduled for special management and with riparian and wildlife protection needs would receive priority for activity planning and project work. The specific improvements and methods used will be identified in activity plans for each area included in the proposed RMP. The identified improvements and methods would include soil or water conservation practices deemed suitable best management.

9 MAY 1988

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44-2

4. The DEIS (pages 144 and 153) states that under Alternatives B and C 43 miles of riparian habitat would be managed to improve current conditions and that management emphasis would be directed toward 50 miles of riparian habitat in eight areas of special management. The final EIS should discuss general management practices which will be afforded to riparian habitat in special management areas. The management practices which will be applied to improve the current condition of 43 miles of riparian habitat should also be discussed.

5. We recommend close coordination with the Arizona Game and Fish Department, U.S. Fish and Wildlife Service, and ADEQ during development and implementation of the riparian management plans. Coordination with these agencies should also occur for management activities or decisions with the potential to impact wetlands and other fish/wildlife habitats (e.g., designation of utility corridors, wildlife enhancement plan development, review of mining plans of operation, development of ORV roads).

#### Air Quality Comments

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1. The Phoenix and Tucson air basins are nonattainment basins for ozone and/or carbon monoxide and experience violations of particulate matter ( $PM_{10}$ ) standards. The Phoenix Resource Area is adjacent to these air basins. We commend ORV controls proposed under Alternative B and C and believe that fugitive emissions may be reduced when the controls are implemented. The DEIS also identifies prescribed burning, road construction, and construction of mineral tailings piles as potential activities which can impact air quality. Page 19 indicates that mitigation for air quality impacts is brought forward in NEPA review of proposed projects. The final EIS should discuss the general mitigation measures which will be employed for identified activities with the potential to impact air quality, particularly in the nonattainment air basins.

#### Toxics Comments

1. The acquisition of up to 476,430 acres of private and state lands may occur under Alternative B (BLM's preferred alternative). We understand that site-specific environmental analyses are prepared for each acquisition. EPA recommends that the final EIS discuss how BLM will determine whether any of the acquired lands contain sites where hazardous wastes were disposed of in past years. Once the lands become BLM property, BLM becomes a responsible party under the terms of the Superfund Amendments and Reauthorization Act of 1986 (P.L. 99-499). As such, BLM could be legally responsible for remedial investigations, cleanup activities, and full or partial cleanup costs. Please contact Julie Anderson at (415) 974-8891 if you have any questions on P.L. 99-499 requirements.

44-2. See 44-1 above.

44-3. Mitigation measures for specific actions called for in activity plans developed upon implementation of the approved RMP would be determined in cooperation with the Arizona Department of Environmental Quality (ADEQ).

WRITTEN COMMENTS AND RESPONSES

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United States  
Department of  
Agriculture

Forest  
Service

Prescott NF

344 South Cortez St.  
Prescott, AZ 86303

Reply To: 1950

Date: May 9, 1988

Arthur E. Tower  
Phoenix Resource Area Manager  
Bureau of Land Management  
2015 West Deer Valley Road  
Phoenix, Arizona 85027

Dear Mr. Tower:

We have reviewed the Draft Phoenix Resource Management Plan and Environmental Impact statement. Your preferred Alternative B subscribes to resource management objects that are similar to those contained in the recently adopted Prescott National Forest Plan. This is particularly true in the areas of range, watershed, and wildlife management.

The draft plan does not contain specific resource management prescriptions but identifies management goals such as to improve watershed condition. Your planned action to achieve the goal is to develop an activity plan. We trust that our Comments will not be too specific for this level of plan and that they can be considered.

45-1 1. Appendix 1 indicates that 100 acres in T. 14 N., R. 12 W., Section 8 (Willow Administrative Site) meet the FLPMA Sales Criteria. That site, however, contains improvements and is actively used as an administrative site by the Prescott National Forest. Therefore, it does not appear to meet the criteria quoted on page 23, "such tract because of its location or other characteristics is difficult and uneconomic to manage as part of the public lands and is not suitable for management by another Federal department or agency." We would recommend this parcel be retained in Federal ownership and transferred to the Forest Service.

45-2 We also have an interest in obtaining the 100 acres Identified in T. 14 N., R. 1 W., Sections 28, 31, and 33. We would utilize these tracts as base for exchange to obtain private inholdings within the National Forest. This would result in improved management of the National Forest and therefore benefit the public.

2. We concur with the rangeland management goals and planned actions as stated. We would encourage coordinated ranch plans be pursued in those cases where a permittee is authorized to operate on adjacent lands administered by the BLM, Forest Service, and/or State of Arizona.

45-1. The Willow Administrative Site has been removed from the list of parcels meeting the criteria for sale in the proposed RMP.

45-2. The land described is not available as exchange base for the Prescott National Forest. It has been identified by the BLN for use in state or private exchanges to facilitate consolidation of land within the proposed Resource Conservation Areas (RCAs).

- 45-3 3. We do not feel that fire management concerns have been adequately addressed. We recommend **more** attention be given to this problem because of the past history of fire starts in the proposed Black Canyon and Lake Pleasant Resource Conservation Areas (RCA). This is particularly critical when you consider the increased recreational activity that will occur as a result of enlarging Lake Pleasant. We encourage you to consider incorporating into the proposed plan the recommendations of previous fire and activity reviews.
- 45-4 4. We have similar concerns in the area of recreation ☐ aneagement. We would anticipate increased recreational use due to expansion plans for Lake Pleasant. The proposed plan is quite general and indicates that specific management plans will be **developed** in cooperation with BLM, Bureau of Reclamation, and Maricopa County.
- 45-4 We feel that the increased use will expand outward from Lake Pleasant and will impact adjacent undeveloped lands including the Prescott National Forest. This not only increases the fire risk, but also requires transportation planning within and outside the Lake Pleasant Cooperative Recreation Management Area (CRMA). WC feel this should be considered and addressed. Access is important to the management of the increasing dispersed recreation use as well as for fire suppression purposes. We recommend that Yavapai County and the Prescott National Forest be included in recreation planning, transportation planning, and fire pre-suppression and suppression planning.
- 45-5 5. There is little mention of law enforcement in the plan. We feel that the law enforcement concern should be identified. We would assume that Maricopa County will handle law enforcement in the Lake Pleasant CRMA but there are concerns outside the CRMA. For example, off road vehicle use is limited to existing roads and trails for all areas. We would anticipate that such restrictions would require increased enforcement activity by the BLM and perhaps Yavapai County.
- 45-6 6. Visual resources **are** not mentioned.
7. Need to change name on map on page 73 from Horsehoe Lake to Horsethief Lake.
- 45-7 8. We understand that the Black Canyon Trail depicted on page 76 enters the Prescott National Forest on Forest Road No. 684 in Secs. 24 and 25, T. 9 N., R. 1 E., rather than paralleling the Forest boundary as shown. We recommend this be corrected to **assure** future coordination is accomplished.
- 45-8 9. We could not locate Hell's Canyon Recreation Management Area or the Williams Mesa Multiple Resource Management Area as listed on page 30.
- 45-9 10. The statement under item 7, page 125 is not accurate. The Willow Administrative Site described under item one of this letter contains Forest Service horse pastures, barn, corrals, storage buildings, a remote access weather station and is actively utilized in managing the Prescott National Forest.

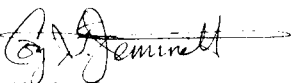
- 45-3. The BLM's Phoenix District fire management policy for the Phoenix Resource Area is stated on page 19 of the draft **RMP/EIS**. The Phoenix District has enjoyed a close working relationship with other fire organizations in the area and we expect the cooperation to continue.
- 45-4. Both Yavapai County and the Prescott National Forest would be included in recreation, transportation and fire suppression plans for the proposed Lake Pleasant Resource Conservation Area.
- 45-S. The BLM's Phoenix District has recently added law enforcement personnel to its staff. These BLM rangers will be responsible for enforcing federal law on public land in the Lake Pleasant area.
- 45-6. Visual resource management was not an issue in the RMP. Impacts on visual and scenic resources are always evaluated by the BLM on a case-by-case basis when considering land use authorizations. Visual resource evaluations are addressed in the environmental assessment prepared for each proposed project.
- 45-7. The comment is correct. The map depicting the Black Canyon Trails **CRMA** has been corrected in the proposed RMP. See map 2-26 in this document.
- 45-a. All special management areas are more clearly delineated on maps in the proposed RMP.
- 45-9. Refer to response 45-1 above.

Arthur E. Tower

45-10 11. As BLM ownership is consolidated under the land tenure adjustment, we request that road and trail easements be reserved to provide for public access to the National Forests. We would be happy to cooperate in any way possible to accomplish this task.

We trust that our comments will be useful to you in the preparation of your final plan and environmental impact statement. We do appreciate the opportunity to review the document and provide input.

Sincerely,



COY G. JEMMETT  
Forest Supervisor

45-10 . The BLM does not anticipate road closures into any of the National Forests.

